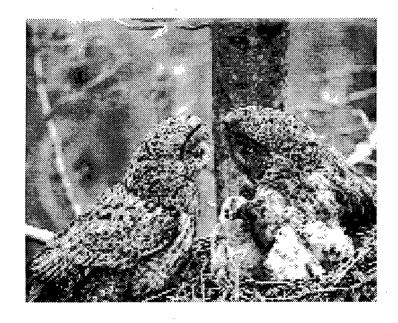


# **Environmental Restoration Program**



Monthly Report for November 1993



**December 20, 1993** 

Document Classification Review Waiver Per Classification Office

A-SW-001436

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# EXECUTIVE SUMMARY

#### SIGNIFICANT ACTIVITIES AND ACHIEVEMENTS FOR NOVEMBER 1993

Copies of the preliminary Operable Unit (OU) 1 Final Phase III Resource Conservation and Recover Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Report were delivered to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH). The regulatory agencies indicated that they may accept the preliminary report as the Final Report. Because of the stop work order, the scheduled Interagency Agreement (IAG) Table 6 milestone for the Final Phase III RFI/RI Report was rescheduled from November 15, 1993, to March 30, 1994.

DOE received all of the data concerning the additional samples at the OU 2 Surface Water (SW) Station SW-132. The Final OU 2 SW Interim Measure/Interim Remedial Action (IM/IRA) Treatability Study Report (TSR) will be completed after comments are received from the agencies on the Draft report. The sampling plan is being revised for the SW IM/IRA.

The OU 2 Subsurface IRA Soil Vapor Survey field work, including the field report, is on schedule to be completed by December 2, 1993. All of the IHSSs were sampled and the data was analyzed. Surveying of the sampling locations was arranged and is scheduled to be completed by December 3, 1993. The Final Baseline Soil Vapor Surveys (SVS) and Detailed SVS Report will be combined into one report that is scheduled to be completed by February 14, 1994.

In support of the OU 4 Phase I RFI/RI Work Plan implementation, vertical drilling in Pond 207 B North and sealing activities, necessary to restore liner integrity and final surveying, were completed in November 1993. Drilling operations in Pond 207 B Center were completed on November 24, 1993.

Solar Ponds closure and Phase I remediation is currently being planned in an IM/IRA Decision Document (DD). Weekly meetings were held with the regulators to obtain early input on issues such as contaminants of concern (COCs), applicable or relevant and appropriate requirements (ARARs), and hot spot remediation. This interactive approach to developing the DD is necessary to meet the obligations from the September 1993 OU 4 dispute resolution.

Prior to closing the Solar Ponds, the wastes currently stored in the ponds will be moved to a new tank farm in tents on the 750 Storage Pad. The poly tank procurement continues. The first tanks will arrive on plant site in December 1993. The design for relocating the tent heaters and the tank layout design was completed. The relocation of the tent heaters in Tent 3 was completed, and the relocation of the tent heaters for Tent 4 is under way. All activities required to receive tanks in Tent 3 were completed. The Heater/Soaker Relocation Statement of Work was approved for construction to allow for operations to continue through the winter.

| DOE. Rocky Flats Plant |
|------------------------|
|------------------------|

DOE was briefed on all operations and technical risk considerations related to the use of the vacuum truck service to remove sludge from the Solar Ponds. On November 10, 1993, authorization was given to proceed with the vacuum truck sludge transport option. The goal is to have the vacuum trucks in operation emptying the Pond 207 B South by the end of December 1993. RFP Construction completed the placement of gravel to upgrade the road near the Pond 207 B South to accommodate the vacuum trucks. Operations can not begin until CDH approves the requested change to interim status for this storage. Approval must be received by December 17, 1993, to meet the schedule goal.

Negotiations with CDH and EPA continue, relative to streamlining the IAG schedule for OU 7 by integrating the IM/IRA process with Phase I and II assessments. This will eliminate the Phase I RFI/RI Report and Phase II RFI/RI Work Plan and Report. The regulatory agencies support this effort. The modification to the subcontract supporting the IM/IRA is under way, and the subcontract modification is projected to be awarded prior to the end of December 1993.

A preferred alternative was announced to address OU 16. The preferred remedy for the soils is the "No Action" alternative for individual hazardous substance sites (IHSSs) 185, 192, 193, 194, 195 within OU 16. These hazardous sites currently present no risk to human health and the environment. Past cleanup actions or natural processes have eliminated the hazardous substances. However, previous cleanup actions and natural processes may not have eliminated the hazardous substances for IHSSs 196 and 197 within OU 16. Therefore, IHSSs 196 and 197 will be transferred for further investigation into OU 5 and OU 13, respectively. A public comment period will be held concurrently for both the Proposed Plan and the Draft Permit Modification. The comment period will be from November 8, 1993, to January 7, 1994. A public hearing will be held on December 8, 1993.

The Surface Water Management Pond Water IM/IRA Decision Document (DD) (Volumes I and II) was delivered to the regulatory agencies on November 22, 1993.

# **IAG Performance Indicators for Monthly Report**

|  | FY94 YTD  | •   |
|--|---|---|
| Number of IAG Table Six Milestones   | (10/1/93 - 11/30 /93)   | Since IAG Inception   |
| Scheduled (including approved extensions)  | 4   | 102   |
| Met  | . 0   | 88<br>27  |
| Extensions Granted Extensions Denied   | . 0   | 21  |
| Remaining this FY94 (to 9/30/94)   | 38  | n/a   |
| Added  | 0   | 5   |
| Deleted  | • 1   | 5   |
| <u>Deliverable in Review by Regulators</u>   | <u>Project</u>  | <b>Date Submitted</b>   |
|  | OU 14 Final Phase I<br>RFI/RI Work Plan   |   |
| Field Work Currently Under Way   | <b>Project</b>  | Scheduled Complete  |
| Please note: these dates reflect   | OU 2  | 08 Oct 93   |
| scheduled field work and   | OU 3  | 13 Jul 93   |
| completed field work.  | OU 4  | Jan 96 <sup>a</sup>   |
|  | OU 7  | 30 Apr 93   |
|  | OU 8  | 16 Sep 94   |
|  | OU 9  | 18 Aug 94   |
| ••   | OU 10   | 15 Aug 94   |
|  | OU 12<br>OU 13  | 05 Sep 94<br>17 Feb 95  |
|  | OU 14   | 11 May 95   |
|  | OU 15   | 12 Nov 93   |
| a for field work Phases I and II   |   |   |
| IM/IRA Status  | <b>Gallons Treated</b>  |   |
|  | Gallerio Troutou  |   |
|  |   |   |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment   | 1,643,159 gallons<br>19,346,180 gallons   |   |
| OU 1 881 Hillside Treatment  | 1,643,159 gallons   |   |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment   | 1,643,159 gallons<br>19,346,180 gallons   | Expected Date   |
| OU 1 881 Hillside Treatment<br>OU 2 903 Pad Water Treatment<br>OU 4 Water Management Tasks   | 1,643,159 gallons<br>19,346,180 gallons<br>Project is in operations phase   | Expected Date 31 Mar 94 *   |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report  | 1,643,159 gallons 19,346,180 gallons Project is in operations phase <u>Due Date</u> 11 Feb 94 15 Nov 93   | 31 Mar 94 *<br>15 Nov 93 *  |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan   | 1,643,159 gallons 19,346,180 gallons Project is in operations phase <u>Due Date</u> 11 Feb 94 15 Nov 93 04 Jan 94   | 31 Mar 94 *<br>15 Nov 93 *<br>17 May 95 *   |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months  OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan OU 2 Draft CMS/FS Report   | 1,643,159 gallons 19,346,180 gallons Project is in operations phase  Due Date  11 Feb 94 15 Nov 93 04 Jan 94 04 Nov 93  | 31 Mar 94 *<br>15 Nov 93 *<br>17 May 95 *<br>17 Oct 96 *  |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months  OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan OU 2 Draft CMS/FS Report OU 3 Draft Phase I RFI/RI Report  | 1,643,159 gallons 19,346,180 gallons Project is in operations phase  Due Date  11 Feb 94 15 Nov 93 04 Jan 94 04 Nov 93 14 Feb 94  | 31 Mar 94 *<br>15 Nov 93 *<br>17 May 95 *<br>17 Oct 96 *<br>02 Nov 93*  |
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| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months  OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan OU 2 Draft CMS/FS Report OU 3 Draft Phase I RFI/RI Report OU 4 Draft Phase I Proposed IM/IRA Decision Document (DD OU 4 Draft Phase II RFI.RI Work Plan  | 1,643,159 gallons 19,346,180 gallons Project is in operations phase  Due Date  11 Feb 94 15 Nov 93 04 Jan 94 04 Nov 93 14 Feb 94  | 31 Mar 94 *<br>15 Nov 93 *<br>17 May 95 *<br>17 Oct 96 *<br>02 Nov 93*  |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months  OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan OU 2 Draft CMS/FS Report OU 3 Draft Phase I RFI/RI Report OU 3 Draft Phase I RFI/RI Report OU 4 Draft Phase I Proposed IM/IRA Decision Document (DD  | 1,643,159 gallons 19,346,180 gallons Project is in operations phase  Due Date  11 Feb 94 15 Nov 93 04 Jan 94 04 Nov 93 14 Feb 94 14 Apr 94 22 Apr 94  | 31 Mar 94 * 15 Nov 93 * 17 May 95 * 17 Oct 96 * 02 Nov 93* 14 Apr 94 22 Apr 94  |
| OU 1 881 Hillside Treatment OU 2 903 Pad Water Treatment OU 4 Water Management Tasks  IAG Document Deliverables Due Next 6 months  OU 1 Draft CMS/FS Report OU 1 Final Phase III RFI/RI Report OU 1 Final Proposed Plan OU 2 Draft CMS/FS Report OU 3 Draft Phase I RFI/RI Report OU 4 Draft Phase I RFI/RI Report OU 4 Draft Phase I RFI/RI Report OU 5 Draft Phase I RFI/RI Report OU 5 Draft Phase I RFI/RI Report OU 7 Final Phase I RFI/RI Report OU 8 Draft Phase I RFI/RI Report OU 8 Draft Phase I RFI/RI Report   | 1,643,159 gallons 19,346,180 gallons Project is in operations phase  Due Date  11 Feb 94 15 Nov 93 04 Jan 94 04 Nov 93 14 Feb 94 14 Apr 94 22 Apr 94 30 Nov 93 16 Mar 94 14 Feb 94  | 31 Mar 94 * 15 Nov 93 * 17 May 95 * 17 Oct 96 * 02 Nov 93 * 14 Apr 94 22 Apr 94 09 Feb 95 * 02 Sep 94 * 12 Nov 15   |
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TBD because of HHRA issues work stoppage.
 Partial delivery, because of the HHRA issues work stoppage.



# PROBLEMS AND PROGRAMMATIC ISSUES

Several changes to Interim Status for OU 4 Solar Ponds storage areas are necessary to support IAG activities. Two of the changes are crucial to the OU 4 schedules: (1) CDH's approval for storage of the pond sludge in tanks on the 750 Pad is on the critical path to meeting DOE's schedule challenge for emptying the ponds. Delay in receiving CDH's approval would result in missing the DOE challenge date. (2) CDH approval is needed to store drill cuttings, which were generated by field investigation work in the 207 B ponds. The drill cuttings are currently stored in a 90-day area. At the end of November 1993, there are 65 days before the 90-day storage limit expires.

A stop work directive was received from the regulatory agencies in August 1993 on sections of the baseline risk assessment. Initially, this stop work directive affected OUs 1 through 7. In October 1993, OU 1 was specifically exempt from the new, proposed methodology for data aggregation in future risk assessments; the OU 2 determination of COCs was partially lifted. OUs 3, 5, 6 and 7 are still affected by the stop work directive. A meeting was held between DOE and EG&G to discuss data aggregation, the number of risk assessments per OU, and other risk assessment issues.

Completion of the Operational Readiness Review (ORR) is delaying the initiation of surficial soil sampling in OU 10. All field work for OU 10 was suspended until comments on the IA HSP are resolved. Field work is now scheduled to begin December 8, 1993.

A resolution of what organization is responsible for the removal of materials from the IHSSs continues to be discussed. Until this issue is resolved, no efforts will be made to begin work on removing all materials found in or around IHSSs 170/174 and 176. However, work will proceed in areas where material storage will not adversely affect data collection activities. Characterization and assessment of IHSSs in OUs 9, 10, and 15 represent significant problems until materials stored in the IHSSs are removed so the IHSSs can be addressed.

DOE, Rocky Flats Plant

|                | IAG   | Date Scheduled         |                               |
|----------------|---|------------------------|-------------------------------|
| OU#            | Milestone Description                                   | to EPA/CDH             | <u>Status</u>                 |
| _              |   | •                      | _                             |
| 2ª             | Submit Draft Phase II RFI/RI Report                     | 12 Mar 93              | Extension denied(delinquent0  |
| 2 <sup>a</sup> | Submit Final Phase II RFI/RI Report                     | 9 Aug 93               | Extension denied(delinquent)  |
| 1              | Submit Draft Proposed Plan                              | 27 Sep 93              | Extension request submitted   |
| 7 <b>a</b>     | Submit Draft Phase I RFI/RI Report                      | 12 Oct 93              | •                             |
| 2ª             | Submit Draft CMS/FS Report                              | .04 Nov 93             | -                             |
| 1              | Submit Final Phase III RFI/RI Report                    | 15 Nov 93              | Extended from 04 Jan 93       |
| 5 <sup>a</sup> | Submit Draft Phase I RFI/RI Report                      | 30 Nov 93              |                               |
| 1              | Submit Final Proposed Plan                              | 04 Jan 94              | Extension request submitted   |
| 1              | Submit Draft CMS/FS Report                              | 11 Feb 94              | Extended from 31 Mar 93       |
| 3 <sup>a</sup> | Submit Draft Phase I RFI/RI Report                      | 14 Feb 94              | Extended from 16 Jul 93       |
| 8              | Submit Draft Phase I RFI/RI Report                      | 14 Feb 94              |                               |
| 7 <sup>a</sup> | Submit Final Phase I RFI/RI Report                      | 16 Mar 94              |                               |
| 9              | Submit Final Phase I RFI/RI Report                      | 11 Apr 94              | -                             |
| 4              | Submit Draft Phase I Proposed IMIRA                     | 14 Apr 94              | On schedule                   |
| 4.6            | Decision Document                                       | 00.404                 | •                             |
| 12             | Submit Draft Phase I RFI/RI Report                      | 20 Apr 94              | On ashadula                   |
| 4              | Submit Draft Phase II Work Plan                         | 22 Apr 94              | On schedule                   |
| 5 <sup>a</sup> | Submit Final Phase I RFI/RI Report                      | 03 May 94<br>06 May 94 | Extension request submitted • |
| 1<br>2a        | Submit Draft Responsiveness Summary                     | 10 May 94              | •                             |
| 2ª<br>2a       | Submit Final CMS/FS Report                              | 10 May 94<br>10 May 94 | •                             |
| 6a             | Submit Draft Phone I REI/RI Report                      | 10 Jun 94              | Extended from 4 Aug 93        |
|                | Submit Draft Phase I RFI/RI Report                      | 24 Jun 94              | On schedule                   |
| 4              | Submit Final Phase I Proposed IM/IRA  Decision Document | 24 Juli 54             | Oij schedule                  |
| 8              | Submit Final Phase I RFI/RI Report                      | 12 Jul 94              | •                             |
| 15             | Submit Draft Phase I RFI/RI Report                      | 01 Aug 94              | On schedule                   |
| 1              | Submit Final CMS/FS Report                              | 03 Aug 94              | *                             |
| 1              | Submit Final Responsiveness Summary                     | 03 Aug 94              | •                             |
| 1              | Submit Draft CAD/ROD                                    | 03 Aug 94              | •                             |
| 13             | Submit Draft Phase I RFI/RI Report                      | 08 Aug 94              | •                             |
| 2a             | Submit Final Proposed Plan                              | 09 Aug 94              | •                             |
| 10             | Submit Draft Phase I RFI/RI Report                      | 25 Aug 94              | · · · · ·                     |
| 9              | Submit Final Phase I RFI/RI Report                      | 06 Sep 94              | •                             |
| 7a             | Submit Draft Phase II RFI/RI Work Plan                  | 13 Sep 94              | •                             |
| 12             | Submit Final Phase I RFI/RI Report                      | 15 Sep 94              | •                             |
| 4              | Submit Final Phase II RFI/RI Work Plan                  | 19 Sep 94              | On schedule                   |
| 11             | Submit Draft Phase I RFI/RI Report                      | 20 Sep 94              | •                             |
| <sub>3</sub> a | Submit Final Phase I RFI/RI Report                      | 21 Oct 94              | Extended from 13 Dec 93       |
| 1              | Submit Final CAD/ROD                                    | 01 Nov 94              |                               |
| 1              | Submit CD/RD Work Plan                                  | 01 Nov 94              |                               |
| 7a             | Submit Draft Phase I Proposed IM/IRA DD                 | 01 Nov 94              | ·                             |
| 6a             | Submit Final Phase I RFI/RI Report                      | 18 Nov 94              | Extended from 07 Jan 94       |
| 2a             | Submit Responsiveness Summary                           | 13 Dec 94              | 1 17                          |
| 14             | Submit Draft Phase I RFI/RI Report                      | 20 Dec 94              | ÷                             |
|                | •   | 1 1 4 to 1             |                               |

Behind original IAG schedule; extension required.
 a OU 2 through OU 7 may require additional extensions because of HHRA issues work stoppage.

# SECTION 1. INTRODUCTION

This monthly status report presents the current status and technical achievements of the Rocky Flats Environmental Restoration Program for November 1993. This program implements the Interagency Agreement (IAG) among the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the State of Colorado to investigate, assess, and remediate, where necessary, contaminated areas at or adjacent to DOE's Rocky Flats Plant in Golden, Colorado. This agreement was signed on January 22, 1991. The work is being performed for DOE by EG&G Rocky Flats, Inc.

The Executive Summary of the report highlights significant achievements, summarizes milestone information, and presents any major unresolved issues of the program. Technical progress, schedule status, and milestone status for each Operable Unit (OU) as well as other program activities are presented in Section 2. Section 3. contains the schedules for routine environmental sampling as required by Paragraph 210 of the Interagency Agreement. Section 4. contains a list that identifies the contractors and subcontractors performing work on the program as required by Paragraph 13 of the IAG.

# SECTION 2. PROJECT STATUS

# 2.1 OU 1 - 881 HILLSIDE AREA

The alluvial ground water at the 881 Hillside Area, located north of Woman Creek in the southeast section of Rocky Flats Plant (RFP), was contaminated in the 1960s and 1970s with solvents and radionuclides. The area is approximately 2 miles from the eastern, outer edge of the plant's buffer zone at Indiana Street. The various Individual Hazardous Substance Sites (IHSS) that make up OU 1 were being investigated and treated as high-priority sites because of potentially elevated concentrations of organic compounds in the near-surface ground water and the proximity of the contamination to a drainage system leading to an offsite drinking water supply. The selected Interim Remedial Action (IRA) at OU 1 involved construction of an underground drainage system called a French drain that intercepts and contains near-surface ground water flowing from the OU 1 area. The near-surface water is treated at the 891 treatment facility, designed for this purpose, tested and released onsite into the South Interceptor Ditch (SID) along Woman Creek. Water collected from this ditch undergoes a secondary analysis prior to release. IRA construction was completed in April 1992. The Remedial Investigation and Feasibility Study (RI/FS) to determine the final remedial action are continuing in parallel with operation of the IRA.

# 2.1.1 OU 1 ASSESSMENT

| Scope of  | Work | Changes |
|-----------|------|---------|
| This Peri | od · |         |

None

Technical Approach Changes This Period

None

| IAG Milestone | •   |
|---------------|-----|
| Accomplishme  | nts |

Submit Draft Phase III RFI/RI Work Plan 06 Feb 90
Submit Final Phase III RFI/RI Work Plan 31 Oct 90
Submit Draft Phase III RFI/RI Report 28 Oct 92

# Future IAG Milestones Through FY95

| Milestone Name                       | IAG Date<br>Scheduled | Extension<br>Status | Accomplishment  Date |
|--------------------------------------|-----------------------|---------------------|----------------------|
| Submit Final Phase III RFI/RI Report | 04 Jan 93             | 15 Nov 93           | 30 Mar 94            |
| Submit Draft CMS/FS Report           | 31 Mar 93             | 11 Feb 94           | 06 Aug 94            |
| Submit Final CMS/FS Report           | 27 Sep 93             | 03 Aug 94           | 02 Feb 94            |
| Submit Draft PP                      | 27 Sep 93             | Pending             | 02 Feb 95            |
| Submit Final PP                      | 04 Jan 94             |                     | 12 May 95            |
| Submit Draft Responsiveness Summary  | 06 May 94             | *                   | 11 Sep 95            |
| Submit Final Responsiveness Summary  | 03 Aug 94             | :                   | 09 Dec 95            |
| Submit Draft CAD/ROD                 | 03 Aug 94             |                     | 09 Dec 95            |
| Submit Final CAD/ROD                 | 01 Nov 94             |                     | 08 Mar 96            |
| Submit Draft Title II Design         | 05 Jul 95             | • • •               | 09 Nov 96            |
|                                      |                       |                     |                      |

# November Work Activity Status

Remedial Investigation (RI) - Copies of the preliminary Phase III Resource Conservation and Recover Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) Report were delivered to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH). The regulatory agencies responded favorably to Sections 1, 2, and 3 of the Final Phase III RFI/RI Report. The regulatory agencies have indicated that they may accept the preliminary report as the Final Report. Because of the stop work order, the scheduled Table 6 Interagency Agreement (IAG) milestone for the Final Phase III RFI/RI Report was rescheduled from November 15, 1993, to March 30, 1994.

On November 23, 1993, the Department of Energy (DOE) presented the field investigation plan for evaluating the suitability of the dense non-aqueous phase liquids (DNAPL) site at individual hazardous substance site (IHSS) 119.1 for six-phase ohmic soil heating and vapor extraction to RFP personnel. Maps of the proposed soil gas sampling were presented, and administrative concerns were discussed and resolved.

Feasibility Study/Corrective Measures Study (FS/CMS) - The possibility of initiating FS work on analyzing alternatives for surficial soils was discussed with the subcontractor. Since it is not anticipated that the status of OU 1 surface soils will change as a result of the Final Phase III RFI/RI Report, the scope can move forward.

Many portions of the FS/CMS, such as final Technical Memorandum (TM) #10, PRG, and draft TM # 11, Alternatives Array, are contingent upon the final results of the Phase III RFI/RI Report.

## **Technical Memoranda**

#### **Project**

TM #10 TM Title TM Status

## OU 1 881 Hillside

Preliminary Remediation Goals Submitted Draft TM to DOE: Feb 93

DOE comments were completed for Appendix A of TM

10: May 93.

When preparation was concluded or is estimated to be

concluded: 15 Aug 93

Projected date of submittal to EPA/CDH: TBD

Actual date of submittal: N/A

Date when comments were received: N/A

TM #11 TM Title TM Status

Alternative Array

Submitted Draft TM to DOE: 21 Oct 93 - Delayed by stop

work order.

When preparation is concluded or is estimated to be

concluded:

Projected date of submittal to EPA/CDH: TBD

Actual date of submittal: N/A

Date when comments were received: N/A

Planned Work for December Continue work on the FS.

 Conduct a series of meetings to present the Final Phase III RFI/RI Report to the regulatory agencies.

**Problems** 

None

**Open Items** 

Many portions of the FS/CMS, such as Technical Memorandum (TM) #10, *Preliminary Remediation Goals (PRG)*, and TM # 11, *Alternatives Array*, are contingent upon the final results of the Phase III RFI/RI Report.

# 2.1.2 OU 1 REMEDIATION

Scope of Work Changes This Period

None

Technical Approach Changes This Period None

IAG Milestone Accomplishments

| Submit Draft Proposed IM/IRA Decision |           |
|---------------------------------------|-----------|
| Document                              | 18 Sep 89 |
| Submit Proposed IM/IRA Decision       |           |
| Document                              | 06 Oct 89 |
| Submit Final IM/IRA Decision Document | 05 Jan 90 |
| Begin Phase I-A IM/IRA Construction   | 15 Jan 90 |
| Restart Phase I-A IM/IRA Construction | •         |
| (after shutdown)                      | 20 Jun 90 |
| Begin Phase I-B IM/IRA Construction   | ,         |
| (ahead of schedule)                   | 28 Sep 90 |
| Submit IM/IRA Implementation Document | 22 Feb 91 |
| Begin Phase II-A IM/IRA Construction  | 01 Apr 91 |
| Begin IM/IRA Testing                  | 05 Aug 91 |
| Begin Phase II-B IM/IRA Construction  | 03 Sep 91 |
|                                       |           |

Complete IM/IRA Construction (891 treatment building) Complete IM/IRA Construction (French drain)

02 Mar 92

13 Apr 92

# Future IAG Milestones Through FY95

None

# November Work Activity Status

On November 15, 1993, DOE received a working draft of the Evaluation of 881 Footing Drain, OU 1 for Discontinuation of Collection and Treatment. This draft pointed out a number of data gaps that must be filled to complete this report. It also identified computational inconsistencies in the Preliminary Risk Assessment Section, which must also be reconciled. Research into filling the data gaps is under way, and will be immediately followed by revisions to the risk calculations.

Results from the Tank 206 radiochemistry samples were also received. Results on effluent Tank 206 for both general chemistry and radiochemistry indicate that the water is acceptable for discharge.

One batch of water in the Tank 210 neutralization tank was found to have an abnormally high specific gravity. The water caused reduced pump discharge capacity, making it more difficult to neutralize the water. A sample of this water was taken, and the tank was successfully neutralized after some additional effort.

Treated ground water this month: Total treated water:

102,000 gallons 1,695,193 gallons

## Planned Work for December

- Begin installation of the gas chromatograph.
- Continue routine collection and treatment of ground water.

## **Problems**

A shortage of chlorine in the U.S. has resulted in a shortage of hydrochloric acid. Enough acid was obtained to last 3 or 4 months. However, should this shortage continue, impacts to future operations might be experienced. Hydrochloric acid is needed to regenerate ion columns 2 and 3 which remove totally dissolved solids (TSD), hardness, alkalinity and metals.

**Open Items** 

None

# 2.2 OU 2 - 903 PAD, MOUND, AND EAST TRENCHES

The contamination at the 903 Pad and Mound areas is largely attributed to the storage in the 1950s and 1960s of waste drums that corroded over time, allowing hazardous and radioactive material to leak into the surrounding soil. Additional contamination may have resulted from wind dispersion during drum removal and soil movement activities. The East Trenches Area was used for disposal of plutonium- and uranium-contaminated waste and sanitary sewage sludge from 1954 to 1968. Two areas adjacent to the trenches were used for spray irrigation of sewage treatment plant effluent; some may have contaminants that were not removed by the treatment system.

An Interim Measure/Interim Remedial Action (IM/IRA) provides for surface water in source areas of contamination to be collected, treated, and discharged to the surface water drainage. Operation of a field-scale treatability unit for the South Walnut Creek drainage began in May 1991. The effectiveness of the treatment process is evaluated at three locations: the entrance to the treatment facility, several points within the facility, and the discharge point. After completion of the field-scale treatability tests, the unit is anticipated to remain in service until the final remedial action is operational. The RI and FS are continuing in parallel with the IRA.

A second IM/IRA was established in late-1991. This Subsurface Investigation Interim Measure/Interim Remedial Action Plan/Environmental Assessment (IM/IRA/EA) is north of Woman Creek and encompasses the 903 Pad, the Mound Area, and the East Trenches Area of OU 2. This IM/IRA evaluates a remedial technology actions for removal of residual free-phase Volatile Organic Compound (VOC) contamination from three distinct subsurface environments at OU 2. Each of the VOC-removal actions involve *in situ* vacuum-enhanced vapor extraction technology. The interim remedial actions for the collection of information will aid in the selection and design of final remedial actions that address subsurface, residual free-phase VOC contamination at OU 2.

#### 2.2.1 OU 2 ASSESSMENT

| This Period                            | None   |           |
|--|--|-----------|
| Technical Approach Changes This Period | None .   |           |
| IAG Milestone<br>Accomplishments       | Submit Draft Phase II RFI/RI Work Plan<br>(Alluvial)<br>Submit Final Phase II RFI/RI Work Plan | 21 Dec 89 |
|  | (Alluvial)   | 12 Apr 90 |
|  | Submit Draft Phase II RFI/RI Work Plan (Bedrock)   | 05 Feb 91 |
|  | Submit Final Phase II RFI/RI Work Plan   |           |
|  | (Bedrock)  | 02 Jul 91 |

# Future IAG Milestones Through FY95

| Milestone Name                      | IAG Date<br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |
|-------------------------------------|-----------------------|---------------------|-----------------------------------|
| Submit Draft Phase II RFI/RI Report | 12 Mar 93             | Denied              | 16 Dec 93*                        |
| Submit Final Phase II RFI/RI Report | 09 Aug 93             | Denied              | 23 May 94*                        |
| Submit Draft CMS/FS Report          | 04 Nov 93             |                     | 17 Oct 96*                        |
| Submit Final CMS/FS Report          | 10 May 94             |                     | 26 Jun 97*                        |
| Submit Draft PP                     | 10 May 94             |                     | 26 Jun 97*                        |
| Submit Final PP                     | 09 Aug 94             |                     | 13 Jan 98*                        |
| Submit Responsiveness Summary       | 13 Dec 94             |                     | 30 Jun 98*                        |
| Submit Draft CAD/ROD                | 16 Mar 95             |                     | 02 Dec 98*                        |
| Submit Final Responsive Summary     | 16 Mar 95             |                     | 02 Dec 98*                        |
| Submit Final CAD/ROD                | 15 Jun 95             |                     | 10 Aug 99*                        |
|                                     |                       |                     |                                   |

<sup>\*</sup>TBD due to HHRA issues work stoppage.

# November Work Activity Status

The first three chapters of the Phase II RFI/RI Report were reviewed by DOE. Three chapters will be submitted to the regulatory agencies after revisions are completed. DOE is currently reviewing chapters four and five.

A meeting was held to discuss data aggregation, the number of risk assessments per OU, and other risk assessment issues. DOE's position is to work out an agreement on risk assessment methodology with EPA then present the methodology to CDH.

#### **Technical Memoranda**

| <u>Project</u> | OU 2-903 Pad, Mound, and East Trenches  |
|----------------|---|
| TM#5           |   |
| TM Title       | Exposure Scenarios  |
| TM Status      | When preparation is concluded or is estimated to be concluded: 15 Jan 93              |
|                | Projected date of submittal to EPA/CDH: 15 Jan 93 Actual date of submittal: 15 Jan 93 |
|                | Date when comments were received: 11 Feb 93 EPA, 12 Mar 93 CDH                        |
| TM#6           |   |
| TM Title       | Modeling  |
| TM Status      | When preparation is concluded or is estimated to be concluded: 15 Jan 93              |
|                | Projected date of submittal to EPA/CDH: 15 Jan 93 Actual date of submittal: 15 Jan 93 |
|                | Date when comments were received: 01 Apr 93 EPA,                                      |

31 Mar 93 CDH

TM#7

TM Title
TM Status

**Surficial Soils** 

When preparation is concluded or is estimated to be

concluded: 07 Jan 93

Projected date of submittal to EPA/CDH: 07 Jan 93

Actual date of submittal: 12 Jan 93

Date when comments were received: 21 Jan 93

TM Approved

TM#8

TM Title
TM Status

Bedrock

When preparation is concluded or is estimated to be

concluded: 15 Mar 93

Projected date of submittal to EPA/CDH: 01 Mar 93

Actual date of submittal: 15 Mar 93

Date when comments were received: 14 Apr 93 EPA,

14 Apr 93 CDH

TM#8 Addendum

TM Title

Contingency Plan for revised Phase II RFI/RI Work Plan

(Bedrock)

**TM Status** 

When preparation is concluded or is estimated to be

concluded:

Projected date of submittal to EPA/CDH: None

Actual date of submittal:

Date when comments are received:

TM #9

TM Title TM Status Chemicals of Concern

When preparation is concluded or is estimate to be

concluded: 24 Aug 93

Projected date of submittal to EPA/CDH: Unknown due to

work stoppage

Actual date of submittal:

Date when comments are received:

TM #10

TM Title

**TM Status** 

**Toxicity Assessment** 

When preparation is concluded or is estimated to be

concluded: 24 Aug 93

Projected date of submittal to EPA/CDH: Unknown due to

work stoppage

Actual date of submittal:

Date when comments are received:

# DOE, Rocky Flats Plant

#### Planned Work for December

- Continue Soil Vapor Extraction.
- Continue FS.
- Continue Surface Water IM/IRA.
- Continue RI Report.

#### **Problems**

None

# **Open Items**

The regulatory agencies are working to arrive at a compromise approach to the Human Health Risk Assessment (HHRA) work stop order issue of data aggregation.

# 2.2.2 OU 2 REMEDIATION

# Scope of Work Changes This Period

None

# Technical Approach Changes This Period

None

# IAG Milestone Accomplishments

| Submit Draft Proposed IM/IRA Decision       | •         |
|---|-----------|
| Document                                    | 19 Jun 90 |
| Submit Proposed Plan IM/IRA Decision        | •         |
| Document                                    | 18 Sep 90 |
| Submit Draft Responsiveness Summary         | 13 Dec 90 |
| Submit Final Responsiveness Summary         |           |
| and Final IM/IRA Decision Document          | 11 Jan 91 |
| Field Treatability Test System Installation |           |
| Complete                                    | 10 May 91 |
| Begin Field Treatability Testing            |           |
| (Carbon System)                             | 03 May 91 |
| Submit Draft Treatability Test Report       |           |
| (Phase I GAC)                               | 01 Apr 92 |
| Complete IM/IRA Construction                |           |
| (radionuclides removal system)              | 24 Apr 92 |
| Begin Field Treatability Testing            |           |
| (radionuclides removal system)              | 27 Apr 92 |
| Submit Final Treatability Test Report       |           |
| (Phase I GAC)                               | 02 Jun 92 |
| Submit Subsurface Site I Draft Test Plan    | 29 Oct 92 |
| Submit Subsurface Site I Final Test Plan    | 12 Jan 93 |

Submit Subsurface Site 2 Draft Test Report Submit Draft Surface Water Field Treatability Report

24 Jun 93

13 Jul 93

# Future IAG Milestones Through FY95

| Milestone Name                                  | IAG Date<br>Scheduled | Extension<br>Status | Accomplishment Date |
|---|-----------------------|---------------------|---------------------|
| Submit Final Phase II Treatability Study Report | 13 Jul 93             | 8 Sep 93            | 8 Sep 93            |

# November Work Activity Status

Subsurface Water (SW) IM/IRA - The soil vapor survey field work, including the field report, will be completed by December 2, 1993. All of the IHSSs were sampled and the data was analyzed. Surveying of the sampling locations was arranged and will be completed by December 3, 1993. The Final Baseline Soil Vapor Surveys (SVS) and Detailed SVS (addendum) Report will be combined into one report that is scheduled to be completed by February 14, 1994.

Surface Water (SW) IM/IRA - DOE has received all of the data concerning the additional samples at Surface Water (SW) Station SW-132. The Final SW IM/IRA Treatability Study Report (TSR) will be completed after comments are received from the agencies on the Draft report. The sampling plan is being revised for the SW IM/IRA.

After a series of malfunctions, the FTU became operational on November 18, 1993.

On November 15, 1993, during normal plant operations, one of the blank membranes ruptured in the microfiltration unit. The rupture appears to have been caused from a material defect. Operations were shut down as soon as the rupture occurred. All of the spilled water was contained in the secondary containment.

New equipment at the 881 Laboratory will be utilized to analyze total uranium. Duplicate samples will be analyzed in order to compare results using standard methods and the new uranium analyzer at the 881 Laboratory. Two advantages of using the new uranium analyzer are cost effectiveness and time savings.

## DOE, Rocky Flats Plant

Efforts are under way to have all activities at the FTU covered by Standard Operation Procedures (SOPs). All SOPs were put into draft forms, and will be ready for use by the end of November 1993. Normal plant operations are now covered under SOPs.

Treated surface water this month:

460,538 gallons

Total treated water:

19,346,180 gallons

# Planned Work for December

## Subsurface IRA Program

Continue work on the SVE Test 1.

# Surface IRA Program

- Continue work on the sampling plan.
- Continue treating water at the OU FTU.

#### **Problems**

**Open Items** 

The FTU continues to operate intermittently.

The Final SW IM/IRA TSR is pending completion until regulatory agency comments are received.

## 2.3 OU 3 OFFSITE AREAS

OU 3 can be divided into two categories based on two main activities. The IAG directs activities according to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This involves assessment of contamination in offsite areas also referred to as Contamination of the Land Surface (IHSS 199), Great Western Reservoir (IHSS 200), Standley Lake (IHSS 201), and Mower Reservoir (IHSS 202). The second category responds to a 1985 out-of-court lawsuit settlement, McKay vs. U.S., which directed that the surface soil contamination be remediated. Remedial activities in compliance with the Settlement Agreement (deep disc plowing) began in 1985. The disturbance resulting from remediation is being revegetated with mediocre success. The overall schedule for this activity is determined by the year-to-year success of the revegetation effort and requirements of the landowners.

| Scope of Work Changes This Period         | None  |           |
|---|---|-----------|
| Technical Approach<br>Changes This Period | None  |           |
| IAG Milestone<br>Accomplishments          | Submit Draft Past Remedy Report<br>Submit Draft Historical Information/<br>Preliminary Health Risk Assessment | 26 Oct 90 |
|   | Report  | 09 Nov 90 |
| •   | Submit Final Past Remedy Report   | 02 Apr 91 |
|   | Submit Final Historical Information/  |           |
|   | Preliminary Health Risk Assessment  |           |
|   | Report  | 16 Apr 91 |
|   | Submit Draft Phase I RFI/RI Work Plan   | 10 Jul 91 |
|   | Submit Final Phase I RFI/RI Work Plan   | 06 Dec 91 |
|   |   |           |

# Future IAG Milestones Through FY95

| Milestone Name                     | IAG Date<br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |
|------------------------------------|-----------------------|---------------------|-----------------------------------|
| Submit Draft Phase I RFI/RI Report | 16 Jul 93             | 14 Feb 94           | 14 Feb 94*                        |
| Submit Final Phase I RFI/RI Report | 13 Dec 93             | 21 Oct 94           | 21 Oct 94*                        |

<sup>\*</sup>TBD due to HHRA issue work stoppage.

# November Work Activity Status

Letters are being written to inform offsite landowners of the laboratory analysis results of soil samples obtained from their property. Only validated data will be sent to the landowners, thus letters will be sent as this data becomes available. RFP authorized work to start on Modification #7 of the subcontract to support work on the Draft and Final Phase I RFI/RI Reports. This modification provides resources needed to adjust the contract following the approval of the schedule extension for the RI Reports.

A stop work directive was received from the regulatory agencies in August 1993 on sections of the baseline risk assessment. This stop work order allowed the parties to the IAG time to evaluate the Gilbert proposal for identifying contaminants of concern (COCs). This issue was resolved. The second issue under the stop work order is the method of data aggregation. Data aggregation for the Human Health Risk Assessment (HHRA) has different requirements under the CERCLA and RCRA. The OU 3 work stoppage on issues related to the baseline risk assessment continues. A meeting was held between DOE and RFP regarding the proposal for the data aggregation issue. The proposal was discussed and revisions are being made. The proposal will then be presented to EPA and CDH in an attempt to resolve the current impasse over the data aggregation issue.

DOE received correspondence proposing a series of FS planning meetings with the regulatory agencies. The FS is a new phase of the regulatory process that OUs 1, 2, 3, and 6 are just beginning. To avoid the problems experienced during the RI phase, an FS Planning Agreement to obtain a comment understanding of the process will be very valuable.

#### **Technical Memoranda**

#### **Project**

TM#1 TM Title TM Status

TM#2 TM Title TM Status

#### **OU 3-Offsite Areas**

Field Changes to RFI/RI Work Plan

When preparation is concluded or is estimated to be

concluded: 10 May 93

Projected date of submittal to EPA/CDH: 10 May 93

Actual date of submittal: 23 Apr 93

Exposure Scenarios for the HHRA

When preparation is concluded or is estimated to be

concluded: 12 May 93

Projected date of submittal to EPA/CDH: 12 May 93

Actual date of submittal: 03 May 93

Date when comments were received: 15 Jul 93

TM#3
TM Title
TM Status

Modeling

When preparation is concluded or is estimated to be

concluded: 29 Sep 93

Projected date of submittal to EPA/CDH: TBD

Actual date of submittal: N/A

Date when comments were received: N/A

TM# 4 TM Title

Contaminants of Concern (currently under a work

stoppage)

TM Status When preparation is concluded or is estimated to be

concluded: 18 Oct 93

Projected date of submittal to EPA/CDH: TBD

Actual date of submittal: N/A

Date when comments were received: N/A

Currently under a work stoppage

Planned Work for December

 Award subcontract for air/meteorological monitoring stations.

• Begin scoping of OU 3 FS.

**Problems** 

None 1

**Open Items** 

The regulatory agencies are working to arrive at a compromise approach to the HHRA work stop order issue of data aggregation.

| DOE, Rocky Flats Plant | - | · · · · · · · · · · · · · · · · · · · |  |
|------------------------|---|---------------------------------------|--|
|                        |   |                                       |  |

# 2.4 OU 4 - SOLAR EVAPORATION PONDS

OU 4 is comprised of five solar evaporation ponds: 207A, 207B series (north, center, south), and 207C, which were constructed for treatment and storage of process water from industrial operations. The process water contained treated acidic wastes, industrial liquid wastes (e.g., metal plating solutions), and low-level radioactive wastes.

As technology improved through the early 1960s and 1970s, the ponds were relined with various upgraded materials. However, leakage from the ponds into the soil and ground water was detected. Interceptor trenches were installed in 1971 to collect and recycle contaminated ground water to the ponds and to minimize natural seepage and pond leakage from entering North Walnut Creek. In 1981, these trenches were replaced by the current, larger interceptor trench system (ITS), which returned approximately 4 million gallons of ground water back into the solar evaporation ponds each year.

No additional process water has been pumped into the ponds since 1986. However, the ITS collected and returned ground water into the solar evaporation ponds until new storage tanks were completed and placed in operation in April 1993. The tanks allowed the RFP to stop placement of contaminated ground water into the ponds. This placement of water into the ponds had been occurring without meeting Land Disposal Restrictions and Minimum Technology Requirements of Resource Conservation and Recovery Act (RCRA). A new, dedicated Building 910 evaporation-treatment facility became operational in July 1993. This building supplements the plant's waste treatment facility in Building 374 to process the water stored in the modular tanks.

The Solar Evaporation Ponds Subproject has been comprised of four technical areas: (1) pond sludge processing by means of the Agreement in Principle between DOE and CDH; (2) a water management/treatment by means of the IM/IRA DD signed by EPA, CDH and DOE; (3) the OU 4 assessment and remedial action, per the IAG which identified the ponds as one of the sixteen OUs to be remediated at the RFP and superseded the 1988 Ponds-Closure Plan submitted by DOE to the regulators; and (4) pad operations and storage activities that are necessary to meet the plant's RCRA interim status and permit requirements with regards to storage of pond wastes. The water management and pond sludge clean-out are necessary precursors to OU 4 assessment and remediation, and pad operations are necessary support activities at least until the pond sludge waste is disposed. Revisions to these areas are being prepared in accordance with the recent dispute resolution for OU 4.

Work in these four areas was planned to close the ponds and remediate OU 4. The work was scoped to (1) remove water from the ponds, (2) provide a treatment facility to replace the ponds as evaporation-treatment and storage units for pond-related contaminated ground water, (3) remove and dispose of pond sludge in compliance with all regulations such as the Land Disposal Restrictions of RCRA, (4) assess the nature and extent of contamination at the ponds; (5) complete a RCRA closure of the impoundments; and (6) remediate the ponds as needed.

The April 1992 IM/IRA was developed as a regulatory agency requirement not included in the scope outlined in the IAG. DOE attempted to modify an existing permit for water removal and treatment for liquids in the solar ponds and ground water collected by the ITS, but the regulatory agencies rejected permit modification and required development of an IM/IRA to

document operation and use of the proposed water treatment system and provide the permitting mechanism for the system. The development and implementation of this IM/IRA preceded and overlapped the IAG scheduled Phase I RFI/RI field work. All construction has been completed, and the IM/IRA treatment facility is now in operation.

# 2.4.1 OU 4 ASSESSMENT

# Scope of Work Changes This Period

Project Work Plan revisions have begun to incorporate the results of the OU 4 dispute resolution, as outlined in the future milestone section. Budget changes to completely implement the revised scope were submitted to DOE/HQ.

# Technical Approach Changes This Period

None ·

# IAG Milestone Accomplishments

Submit Draft Phase I RFI/RI Work Plan

O8 Jun 90

Submit Final Phase I RFI/RI Work Plan

26 Nov 90

# Future IAG Milestones Through FY95

| IAG Date<br>Scheduled | Extension<br>Status                 | Planned Accomplishment Date  |
|-----------------------|-------------------------------------|--|
| 21 May 93             | N/A                                 | Deleted  |
| 18 Oct 93             | N/A                                 | Deleted  |
| 22 Apr 94             |                                     | 22 Apr 94  |
| 19 Sep 94             |                                     | 19 Sep 94  |
|                       | 21 May 93<br>18 Oct 93<br>22 Apr 94 | Scheduled         Status           21 May 93         N/A           18 Oct 93         N/A           22 Apr 94         N/A |

# November Work Activity Status

Data evaluation and report development continues for the Phase I RFI/RI Report for inclusion in the IM/IRA Environmental Assessment (EA) DD.

Vertical drilling was completed on November 10, 1993, in Pond 207 B North in support of the Phase I RFI/RI Work Plan implementation. Sealing activities necessary to restore liner integrity and final surveying were completed on November 12, 1993. Drilling operations began in Pond 207 B Center on November 16, 1993; and were completed by November 24, 1993.

Meetings were held with the subcontractor to discuss, evaluate and interpret vadose zone data collected during the Phase I RFI/RI Program. Post-closure

monitoring techniques for RCRA subtitle C facilities were also discussed.

The preliminary presentations of data indicate that the extent of contamination is greater than expected. Levels of several COC that exceed their preliminary remediation goals (PRGs) appear to be present in both surficial and subsurface soils immediately north of the ponds. Validation of these indications is expected in December 1993.

Phase I Interim Measures/Interim Remedial Action Plan (IM/IRA) Program - Weekly progress meetings continue among the regulatory agencies, DOE and RFP. Topics of discussion include the following: COC, PRGs, preliminary presentation of physical extent of contamination and consolidation of alternative remedial technologies. A number of issues were resolved at the meetings. COCs were identified and the PRGs for each COC were determined. These meetings support both the OU 4 Assessment and OU 4 Remediation Work Breakdown Structure (WBS) elements.

## **Technical Memoranda**

# **Project**

TM #1 TM Title TM Status

# **OU 4-Solar Evaporation Ponds**

Vadose Zone Investigation

Draft submitted to EPA/CDH: 16 Nov 92

Comments received: 30 Nov 92 Conditional Approval: 30 Nov 92

Projected submittal of Final to EPA/CDH: 15 Dec 92

Actual submittal date of Final: 15 Dec 92

Submittal of TM 1 Vadose Zone Schedule: 19 May 93

EPA/CDH Final Approval of TM 1: 17 Jun 93

TM #2 TM Title TM Status

Modification to Field Activities

Draft submitted to EPA/CDH: 18 Mar 93

Comments received: 07 May 93

Projected submittal of Final to EPA/CDH: 07 Jun 93

Actual submittal date of Final: 09 Jun 93 EPA/CDH Final Approval of TM 2: 30 Jun 93

## DOE. Rocky Flats Plant

TM #3
TM Title
TM Status

**Environmental Evaluation** 

Draft submitted to EPA/CDH: 19 Mar 93

Comments received: EPA 21 Apr 93, CDH 02 Jun 93 Projected submittal of Final to EPA/CDH: 30 Apr 93

Actual submittal date of Final: 02 Jul 93 EPA/CDH Final Approval of TM 3: 30 Jul 93

TM #4
TM Title
TM Status

Human Health Risk Assessment Exposure Scenarios

Draft submitted to EPA/CDH: 19 Mar 93

Comments received: EPA 21 Apr 93, CDH 23 Apr 93 Projected submittal of Final to EPA/CDH: 11 Jun 93

Actual submittal date of Final: 11 Jun 93 Received stop work order: 24 Aug 93

TM #5
TM Title
TM Status

**Exposure Models** 

Projected submittal of Draft to EPA/CDH: 01 Aug 93

Actual submittal of Draft: 24 Jun 93

Projected submittal of Final to EPA/CDH: 15 Oct 93

Received stop work order: 24 Aug 93

TM #6 TM Title

Contaminants of Concern

TM Status

Projected submittal of Draft to EPA/CDH: 09 Nov 93 Projected submittal of Final to EPA/CDH: 22 Dec 93

Received stop work order: 24 Aug 93

TM #7
TM Title
TM Status

**Toxicity Assessment** 

Projected submittal of Draft to EPA/CDH: 04 Nov 93 Projected submittal of Final to EPA/CDH: 22 Dec 93

Received stop work order: 24 Aug 93

Planned Work for December

• Development of the IM/IRA DD, which includes the RFI/RI data, will continue.

**Problems** 

None

Open Items

Work continues on the approval of a baseline change proposal (BCP) for the streamlined OU 4 IM/IRA schedule and resources.

Incorporation of the dispute resolution results into the project budget is pending DOE/HQ approval.

# 2.4.2 OU 4 REMEDIATION

## Scope of Work Changes This Period

The project budget approval documents are being revised to incorporate scope changes to the IM/IRA DD committed to in the OU 4 dispute resolution. The revisions were submitted to DOE/HQ for approval.

# Technical Approach Changes This Period

Remediation is planned in two OU 4 cost account WBS elements. The technical approach for moving sludge from the ponds to 750 Pad was changed from a pipeline to vacuum trucks.

# IAG Milestone Accomplishments

None. The first IAG remediation milestone for this OU is the Draft Phase I Proposed IM/IRA DD scheduled for April 14, 1994.

## Future IAG Milestones Through FY95

| Milestone Name                              | IAG Date<br>Scheduled | Extension<br>Status | Planned Accomplishment Date |
|---|-----------------------|---------------------|-----------------------------|
| Submit Draft Phase I Proposed IM/IRA        |                       |                     |                             |
| Decision Document                           | 14 Apr 94             |                     | 14 Apr 94                   |
| Submit Final Phase I Proposed IM/IRA        |                       |                     |                             |
| Decision Document                           | 12 Sep 94             | 24 Jun 94           | 24 Jun 94                   |
| All Solar Ponds Emptied of Water and Sludge | new                   |                     | 20 Jan 95                   |

# November Work Activity Status

Regulatory - An Action Description Memorandum (ADM) is nearing completion for the OU 4 Phase I remediation. DOE will determine the level of National Environmental Policy Act (NEPA) documentation required for the project. The planning baseline calls for an EA and Finding of No Significant Impact. Anticipated schedule acceleration of Building 788 is no longer compatible with the planned documentation schedule. This scheduling problem and potential work-arounds will be noted in the ADM transmittal.

Several changes to Interim Status for Solar Ponds storage areas are necessary to support OU 4 IAG activities. DOE is preparing to transmit the requests to CDH. Two of the changes are of crucial importance to OU 4 schedules. (1) CDH's approval for storage of the pond sludge in tanks on the 750 Pad is on the critical

path to meeting DOE's schedule challenge for emptying the ponds. While a large amount of information on the tank system was provided to CDH, an item-by-item response to the relevant regulations in 6 Code of Colorado Regulations (CCR) 1007-3 was requested. The RFP permitting staff are discussing the request with CDH to ensure that they understand what is needed, and a draft response is simultaneously being prepared. Delay in receiving CDH's approval would result in missing the DOE challenge date. (2) CDH approval is needed to store drill cuttings, which were generated by field investigation work in the 207 B ponds. The drill cuttings are currently stored in a 90-day area. While DOE formally transmitted a separate letter requesting this change. CDH has indicated it will wait for receipt of DOE's transmittal of the change to Interim Status request before taking action. To date, no problem with obtaining approval was identified. At the end of November 1993, there are 65 days before the 90-day storage limit expires.

A review, based on the subcontractor's estimate, began on the cost estimate for removal of liners from the Solar Ponds. This task is emerging as a key element in developing the IM/IRA and the project cost estimate. While a completely new cost estimate is to be generated in January 1994, based on the conceptual design that will be prepared, some information is required prior to that estimate.

Pond Sludge Status and Issues - The poly tank procurement continues. The first tanks will arrive on plant site in December 1993. The design for relocating the tent heaters and the tank layout design was completed. The relocation of the tent heaters in Tent 3 was completed, and the relocation of the tent heaters for Tent 4 is under way. All activities required to receive tanks in Tent 3 were completed. The Heater/Soaker Relocation SOW was approved for construction.

On November 8, 1993, DOE was briefed on all operations and technical risk considerations related to the use of the vacuum truck service to remove sludge from the Solar Ponds. On November 10, 1993, authorization was given to proceed with the vacuum truck sludge transport option. The vacuum truck services contract was awarded on November 24, 1993. Four bids were received, and the technical evaluation of these bids is under way. The goal is to have the vacuum truck in operation emptying the 207 B South Pond by December

1993. Construction completed the placement of gravel to upgrade the road near the 207 B South Pond to accommodate the vacuum trucks.

Water Management - The Building 910 evaporator operated intermittently during November 1993. ITS water was pumped to Building 910 and pumping from the solar ponds to Building 374 began. This action was taken in preparation for the upcoming accelerated sludge removal project (ASRP) activity of removing sludge with a vacuum truck. The valves on the B910 number one unit were replaced and the unit is now available for operation. The number three unit is unavailable for operation due to generator problems. The generator shuts down apparently without reason. Efforts continue to determine the cause of the generator problems.

# Planned Work for December

- Arrival of tanks for storage of pond sludge.
- Continued acceleration in the sludge removal schedule is needed to meet DOE's challenge schedule to empty pond 207-B South.
- Modification to subcontracts will be made to incorporate the scope changes mandated by the dispute resolution.
- Continue pond closure planning. The ADM for the NEPA determination will be transmitted to DOE for a determination and closure alternatives will be evaluated.
- Begin IM/IRA technical consultation.
- Begin Phase II Work Plan.
- Obtain CDH approval for change to Interim Status.

#### **Problems**

A change to RCRA Interim Status is needed to support storage of sludge on the 750 Pad. The schedule is slipping because of ongoing requests for additional information from the State. Also, DOE does not agree with the State's request that coupons be used to monitor material compatibility in the tanks. While all the outstanding issues can be resolved to meet the commitment schedule, it is unlikely the change will be approved in time to meet DOE's challenge schedule,

# DOE, Rocky Flats Plant

which requires a 10-month acceleration over the commitment schedule.

In planning the closure of the ponds, disagreements have arisen between RFP and the regulators over disposition of the pond liners and soils from the north slope of the pond area. Progress on these issues appears to have stalled. If a satisfactory plan cannot be identified soon, IAG milestones following the draft IM/IRA DD could be jeopardized or additional funding would be required.

## **Open Items**

Reprogramming of budgets to implement the dispute resolution is pending. Some impact on other Environmental Restoration (ER) projects is expected as funds are reallocated.

D&D of Building 788 must be funded and planned.

## 2.5 OU 5 - WOMAN CREEK

This activity encompasses assessment and remediation of 10 IHSSs in the Woman Creek drainage: Original Landfill (IHSS 115); Ash Pits (IHSS 133.1 - 133.4); Incinerator (IHSS 133.5); Concrete Wash Pad (IHSS 133.6); Detention Ponds C-1 and C-2 (IHSS 142.10 and 142.11); Surface Disturbance (IHSS 209), southeast of Building 881. Two additional surface disturbances have been identified and are located, one south of the Ash Pits and a second west of IHSS 209. These last two sites have been included in the OU 5 Work Plan. Possible contamination in this operable unit was caused by landfill operations, storm-water runoff into holding ponds, and ash-pit operations. Constituents in OU 5 are believed to include nitrates, depleted uranium, metals, beryllium, solvents, pesticides, oils, paints, and cleaners. Media affected include soils, sediments, surface water, ground water, and air resuspension.

Scope of Work Changes
This Period

None

Technical Approach Changes This Period

None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work Plan Submit Final Phase I RFI/RI Work Plan 05 Apr 91 30 Aug 91

# Future IAG Milestones Through FY95

| Milestone Name                     | <u>IAG Date</u><br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |
|------------------------------------|------------------------------|---------------------|-----------------------------------|
| Submit Draft Phase I RFI/RI Report | 30 Nov 93                    |                     | 09 Feb 95*                        |
| Submit Final Phase I RFI/RI Report | 03 May 94                    |                     | 18 Oct 95*                        |

<sup>\*</sup> TBD due to HHRA issues work stoppage.

# November Work Activity Status

There has not been a resolution to the HHRA stop work order on data aggregation, selection of COC, and statistical comparisons for OU 5. The stop work order has caused TM #12, *Exposure Scenarios*, and TM #13, *Models*, to be delayed which has impacted HHRA schedules.

DOE received the comment/response sheets on TM #12, *Exposure Scenarios*, on November 22, 1993, and also received the draft TM #13, *Modeling*, on November 24, 1993. A milestone extension request that equals the time lost by the HHRA stop work order will be requested of the regulatory agencies.

Approximately 80-85 percent of the Phase I RI analytical data was returned to Rocky Flats Environmental Database System (RFEDS). Data management, aggregation of data, and statistical evaluation cannot begin until the database or subsets of the database are complete.

Sections of the Draft Phase I RFI/RI Report are in progress, including a summary of Field Investigations Activities, Geological Characterization, and the Nature and Extent section.

RFP Procurement awarded the modification to the subcontract for conducting an EM 61 - Time Domain Electromagnetic Geophysical Survey. The work will begin on January 3, 1994.

Drafts of Corrective Action Plans for programmatic issues/deficiencies noted in the DOE audit of OU 5 were finalized. The plans involve input from RFP groups to ensure that only valid and usable data are reported in final reports to the regulatory agencies.

#### **Technical Memoranda**

# **Project**

# OU 5-Woman Creek Priority Drainage Remedial Investigation

TM#1
TM Title
TM Status

Surface Water and Sediments

When preparation is concluded or is estimated to be

concluded: 30 Nov 92

Projected date of submittal to EPA/CDH: 30 Nov 92

Actual date of submittal: 13 Oct 92

TM#2 TM Title TM Status

**Surface Geophysics** 

When preparation is concluded or is estimated to be

concluded: 30 Nov 92

Projected date of submittal to EPA/CDH: 30 Nov 92

Actual date of submittal: 13 Oct 92

TM#3 TM Title TM Status

Soil Sampling at IHSS 115

When preparation is concluded or is estimated to be

concluded: 07 May 93

Projected date of submittal to EPA/CDH: 07 May 93

Actual date of submittal: 26 Jan 93

TM#4

TM Title TM Status Soil Sampling at IHSS 133

When preparation is concluded or is estimated to be

concluded: 07 Jun 93

Projected date of submittal to EPA/CDH: 07 Jun 93

Actual date of submittal: 12 Apr 93

TM#5

TM Title

TM Status

Soil Gas Sampling at IHSS 115

When preparation is concluded or is estimated to be

concluded: 07 May 93

Projected date of submittal to EPA/CDH: 07 May 93

Actual date of submittal: 25 Mar 93

TM#6

TM Title

Cone Penetrometer at IHSS 115 **TM Status** 

When preparation is concluded or is estimated to be

concluded: 14 Apr 93

Projected date of submittal to EPA/CDH: 14 Apr 93

Actual date of submittal: 25 Mar 93

TM#7

TM Title TM Status Soil Borings at IHSS 133

When preparation is concluded or is estimated to be

concluded: 07 May 93

Projected date of submittal to EPA/CDH: 07 May 93

Actual date of submittal: 19 Feb 93

TM#8

TM Title

TM Status

Monitoring Wells at IHSS 115

TM 8 has been canceled, and has been replaced by a letter outlining the justification behind the location of the

wells in IHSS 115

TM#9

TM Title

Monitoring Wells at IHSS 133, Ash Pits, Incinerator and

Concrete Wash Pad

TM Status

When preparation is concluded or is estimated to be

concluded: 14 May 93

Projected date of submittal to EPA/CDH: 06 May 93

Actual date of submittal: 06 May 93

EPA/CDH comments scheduled: 11 Jun 93

Actual date of submittal: 28 Jun 93

TM#10 TM Title TM Status

Soil Borings at IHSS 209

When preparation is concluded or is estimated to be

concluded: 06 Mar 93

Projected date of submittal to EPA/CDH: 06 Mar 93

Actual date of submittal: 06 Mar 93

TM #11

TM Title

TM Status

Contaminants of Concern To be scheduled in FY94

TM #12

TM Title

**TM Status** 

Exposure Scenarios

When preparation is concluded or is estimated to be

concluded: 24 Nov 93

Projected date of submittal to EPA/CDH: TBD

Actual date of submittal: N/A

TM #13

TM Title TM Status Modeling

When preparation is concluded or is estimated to be

concluded: 12 Jan 94

Projected date of submittal to EPA/CDH: 12 Jan 94

Actual date of submittal: N/A

TM #14

TM Title

TM Status

**Toxicity Assessment** 

To be scheduled in FY94

Planned Work for

December

Continue work on the RFEDS database.

**Problems** 

None

**Open Items** 

The regulatory agencies are working to arrive at a compromise approach to the HHRA work stop order

issue of data aggregation.

# 2.6 OU 6 - WALNUT CREEK

This activity encompasses assessment and remediation in the Walnut Creek Drainage of 21 IHSSs: A-series Detention Ponds, Ponds A-1 through A-4 (IHSS 142.1 through 142.4 and 142.12); the B-series Detention Ponds, Ponds B-1 through B-5 (IHSS 142.5 through 142.9); the North, Pond, and South Area Spray Fields (IHSS 167.1, 167.2 and 167.3); the East Area Spray Field (IHSS 216.1), the Trenches A, B and C (IHSS 166.1, 166.2 and 166.3); the Sludge Dispersal Area (IHSS 141); the Triangle Area (IHSS 165); the Old Outfall Area (IHSS 143), and the Soil Dump Area (IHSS 156.2).

Completion of field operations resulted in obtaining the following samples from the IHSSs in OU 6: stream sediment, pond sediment, surface soil, subsurface soil, surface and ground water.

Eleven new ground water monitoring wells, installed in OU 6 to supplement five existing wells, are being sampled each quarter for a minimum of 1 year. Geophysical surveys and radiation surveys were performed in selected areas to supplement the sampling activities.

The regulatory agencies have proposed a new IM/IRA on the operation of the RFP Ponds. If approved, this IM/IRA would affect the RFP pond water management, including OU 6, placing the water under CERCLA rather than the National Pollution Discharge Elimination System (NPDES).

| Scope  | of Work | Changes |
|--------|---------|---------|
| This P |         | •       |

None

# Technical Approach Changes This Period

None

# IAG Milestone Accomplishments

Submit Draft Phase I RFI/RI Work Plan Submit Final Phase I RFI/RI Work Plan 19 Apr 91 16 Sep 91

# Future IAG Milestones Through FY95

| Milestone Name                     | IAG Date<br>Scheduled | Extension<br>Status | Planned Accomplishment Date |
|------------------------------------|-----------------------|---------------------|-----------------------------|
| Submit Draft Phase I RFI/RI Report | 4 Aug 94              | 10 Jun 94           | 21 Oct 94*                  |
| Submit Final Phase I RFI/RI Report | 7 Jan 94              | 18 Nov 94           | 10 Jul 95*                  |

Completion date to be rescheduled due to HHRA issues work stoppage.

# November Work Activity Status

Sections of the Draft Phase I RFI/RI Report are in progress, including a summary of Field Investigations Activities, Geological Characterization, and the Nature and Extent section. The Draft Phase I RFI/RI Report

milestone delivery date is June 10, 1994; however because of the HHRA stop work order, a schedule extension will be requested.

TMs that guide the HHRA are in progress, but are affected by the stop work order. There has not been a resolution to the HHRA stop work order, on data aggregation, selection of COCs, and statistical comparisons. TM #1, COC, continues to be on hold; TM #2, Exposure Scenarios, and TM #3, Models, continue to be delayed.

The analytical database is complete, and approximately 85% validated. The subcontractor is involved with database management and clean up, preliminary histograms were produced (with aggregated data for the entire OU) for CLP metals.

# **Technical Memoranda**

# **Project**

# **OU 6-Walnut Creek**

TM#1 TM Title TM Status

Work Plan Modifications Approved by EPA: 08 Jan 93

TM#2 TM Title TM Status

**Exposure Scenarios** 

When preparation is concluded or estimated to be

concluded: 01 Feb 94

Projected date of submittal to EPA/CDH: 15 Feb 94

Actual date of submittal: TBD

Date when EPA/CDH comments received: N/A

TM#3
TM Title
TM Status

Modeling Surface and Ground Water

When preparation is concluded or is estimated to be

concluded: 01 Jan 94

Projected date of submittal to EPA/CDH: 15 Jan 94

Actual date of submittal: TBD

Date when EPA/CDH comments received: N/A

TM#4
TM Title
TM Status

Contaminants of Concern

When preparation is concluded or is estimated to be

concluded: 15 Mar 94

Projected date of submittal to EPA/CDH: 30 Mar 94

Actual date of submittal: N/A

Date when EPA/CDH comments received: N/A

TM#5
TM Title
TM Status

**Toxicity Factors** 

When preparation is concluded or is estimated to be

concluded: 15 Mar 94

Projected date of submittal to EPA/CDH: 30 Mar 94

Actual date of submittal: N/A

Date when EPA/CDH comments received: N/A

Planned Work for December

• Continue finalization of TMs #2 and #3.

**Problems** 

Stop work order has prevented continued work to be accomplished on the TM #4, COC and delayed TM #2, Exposure Scenarios, and TM #3, Modeling.

Open Items

The regulatory agencies are working to arrive at a compromise approach to the HHRA work stop order issue of data aggregation.

# 2.7 OU 7 - PRESENT LANDFILL

The Present Landfill - OU 7 is located north of the plant complex on the western edge of an unnamed tributary of North Walnut Creek and is comprised of two IHSSs. IHSS 114 includes landfill waste and leachate at the Present Landfill, soils beneath the landfill potentially contaminated with leachate, and sediments and water in the East Landfill Pond. IHSS 203 contains potentially contaminated soils at the Inactive Hazardous Waste Storage Area. A section of the Present Landfill located in the southwest corner was used between 1986 and 1987 as a temporary storage area for hazardous waste. The Present Landfill began operation in August of 1968 and was originally constructed to provide for disposal of RFP's nonradioactive and nonhazardous wastes. In September 1973, tritium was detected in leachate from the landfill. During the mid-1980s, extensive investigations were conducted on the waste streams (types) placed into the landfill; consequently, hazardous wastes/ hazardous constituents were identified. Although currently operating as a nonhazardous sanitary landfill, the facility is considered an inactive hazardous waste disposal unit undergoing RCRA closure.

| Scope  | of Work | Changes |
|--------|---------|---------|
| This P |         |         |

None

Technical Approach Changes This Period None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work Plan Submit Final Phase I RFI/RI Work Plan 08 Jun 90 28 Aug 91

# Future IAG Milestones Through FY95

|   | IAG Date         | Extension     | Planned<br>Accomplishment |
|---|------------------|---------------|---------------------------|
| Milestone Name                          | <u>Scheduled</u> | <u>Status</u> | <u>Date</u>               |
| <i>,</i>                                |                  |               | ·                         |
| Submit Draft Phase I RFI/RI Report      | 12 Oct 93        |               | 20 Dec 93*                |
| Submit Final Phase I RFI/RI Report      | 16 Mar 94        |               | 02 Sep 94*                |
| Submit Draft Phase II RFI/RI Work Plan  | 13 Sep 94        | •             | 07 Aug 95*                |
| Submit Draft Phase I Proposed IM/IRA DD | 01 Nov 94        |               | 14 Feb 97*                |
| Submit Final Phase II RFI/RI Work Plan  | 15 Feb 95        |               | 15 Apr 96*                |
| Submit Final Phase I Proposed IM/IRA DD | 06 Apr 95        |               | -16 Oct 97*               |
| Submit IM/IRA Responsiveness Summary    | 14 Aug 95        | •             | 14 May 98* ·              |

<sup>\*</sup>Completion date to be rescheduled due to HHRA issues work stoppage.

# November Work Activity Status

Negotiations with CDH and EPA continue relative to streamlining the IAG schedule for OU 7 by integrating the IM/IRA process with Phase I and II assessments. This will eliminate the Phase I RFI/RI Report and Phase II RFI/RI Work Plan and Report. The regulatory agencies support this effort. The modification to the subcontract supporting IM/IRA is projected to be awarded prior to the

end of December 1993. A detailed life cycle schedule is being developed for the landfill closure process.

Work continues on refining a strategy to assess risk at the landfill. A draft framework document was completed to form a baseline strategy and will be transmitted to the regulatory agencies. A meeting will be scheduled for December 1993 to redefine data quality objectives (DQOs) for OU 7.

# **Technical Memoranda**

# **Project**

# OU 7 - Present Landfill

TM #1 TM Title TM Status

**Exposure Scenarios** 

Initial reviews completed by DOE/HQ and DOE. Review completed by EPA and CDH. Response summary developed and submitted to all parties for review. Reviews complete. Revised response summary completed 25 May 93, with a final review under way prior to transmittal to the agencies.

TM #2 TM Title TM Status

**Model Description** 

Transmitted to EPA and CDH for review: 08 Jan 93 Initial review by EPA, CDH, and DOE completed:

30 April 93

Draft response summary complete: 25 May 93

TM #3 TM Title

Addendum to Final Phase I RFI/RI Work Plan. Surface Soil and Asbestos Pit Disposal Area Characterization

Plan.

TM Status

Transmitted to DOE for review: 05 Feb 93

Transmitted to the EPA and CDH for review: 08 Feb 93

Comments received: 26 Apr 93

Conditional approval by the EPA and CDH received:

22 Feb 93

Clarification of outstanding comments from EPA and

CDH received: 03 May 93

TM #4
TM Title
TM Status

Contaminants of Concern Under development

# Planned Work for December

- Continue to finalize the rescoping for OU 7.
- Award IM/IRA Subcontract.

# **Problems**

An approved data aggregation methodology has not been finalized. Draft DOE proposals for data aggregation indicate potential cost and schedule impacts exist because of multiple risks assessments. The total number of risk assessments required for each OU will be negotiated with the regulatory agencies and based upon data aggregation criteria that may not be supported by current agency approved work plans.

# **Open Items**

The regulatory agencies are working to arrive at a compromise approach to the HHRA work stop order issue of data aggregation and a methodology for comparisons of site specific data to background valves.

# 2.8 **OU 8 - 700 AREA**

The 24 IHSSs that constitute OU 8 encompass separate sites inside and around the production area of the Rocky Flats Plant. Contamination sources within the various IHSSs include above ground and underground tanks, equipment washing areas, and releases inside buildings which potentially affected areas outside the buildings. Contaminants from these sources may have been introduced into the environment through spills on the ground surface, underground leakage and infiltration, and in some cases through precipitation runoff. The chemical composition of the contaminants also varies widely between the IHSSs, ranging from low-level radioactive mixed wastes to nonradioactive organic and inorganic compounds.

Scope of Work Changes This Period

None

**Technical Approach Changes This Period** 

None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work Plan Submit Final Phase I RFI/RI Work Plan

01 May 92 01 Dec 92

Future IAG Milestones Through FY95

| Milestone Name                     | IAG Date<br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |
|------------------------------------|-----------------------|---------------------|-----------------------------------|
| Submit Draft Phase I RFI/RI Report | 14 Feb 94             | •                   | 02 Nov 15                         |
| Submit Final Phase I RFI/RI Report | 12 Jul 94             |                     | 19 Jul 16                         |

# November Work Activity Status

DOE reviewed and commented on the Draft Phase I Data Summary for the Industrial Area (IA) Environmental Evaluation (EE) received by DOE on November 11, 1993. The bird observation survey addendum to the Phase I Data Summary and the Phase II Data Summary for the IA EE was completed in November 1993 and will be delivered to DOE for review and comment by December 10, 1993.

# · Technical Memoranda

### None

Planned Work for December

 Continue the IA OU EE field work and complete the data summary reviews.

**Problems** 

None

**Open Items** 

None



# 2.9 OU 9 - ORIGINAL PROCESS WASTE LINES

This activity involves characterizing a series of tanks and associated process waste lines. The original process waste lines (OPWL) consisted of 35,000 feet of buried pipeline that transferred process wastes from production buildings to onsite treatment plants. A system of 60 designated pipe section, 46 storage tank sites, and 3 other areas of suspected process waste leakage are included in OU 9. The system was placed into operation in 1952, and additions were made to the system through 1975. The original system was replaced over the 1975-1983 period by the new process waste system. Some tanks and lines from the original system were incorporated into either the new process waste system or the fire water deluge collection system.

The original system is known to have transported or stored various aqueous process wastes containing low-level radioactive materials, nitrates, caustics, and acids. Small quantities of other liquids were also introduced in the system, including medical decontamination fluids, miscellaneous laboratory liquids, and laundry effluent. The RFI/RI plan includes inspection and sampling of the OPWL tanks and pipelines that are accessible and soil sampling to determine the extent of contamination in the vadose zone. The soil sampling will be performed by installing test pits and boring where known or suspected releases occurred, near pipe joints and valves, at approximately 200-foot intervals along the pipelines, and by installing borings around the outdoor tanks. Soil characterization studies will determine the need for soil removal and/or treatment. The results of the RFI/RI will determine the need for interim and/or final remediation action.

| Scope of Work Changes<br>This Period      | None   |                        |
|---|--|------------------------|
| Technical Approach<br>Changes This Period | None •   |                        |
| IAG Milestone<br>Accomplishments          | Submit Draft Phase I RFI/RI Work Plan<br>Submit Final Phase I RFI/RI Work Plan | 08 Jun 90<br>26 Nov 91 |

# Future IAG Milestones Through FY95

| <u>Milestone Name</u>                   | IAG Date<br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |
|---|-----------------------|---------------------|-----------------------------------|
| Submit Draft Phase I RFI/RI Report      | 11 Apr 94             | •                   | 04 Jan 01                         |
| Submit Final Phase I RFI/RI Report      | 06 Sep 94             | ,                   | 16 Sep 03                         |
| Submit Draft Phase II RFI/RI Work Plan  | 10 Mar 95             | •                   | 23 Jul 04                         |
| Submit Draft Phase I Proposed IM/IRA DD | 01 May 95             |                     | 31 Oct 03                         |
| Submit Final Phase II RFI/RI Work Plan  | 07 Aug 95             |                     | 01 Apr 05                         |
| Submit Final Phase   Proposed IM/IRA DD | 27 Sep 95             |                     | 12 Jul 04                         |

# November Work Activity Status

The preliminary draft OU 9 TM #1, Field Sampling Plan, Part I, Outside Tanks, was received by DOE on September 30, 1993. DOE comments are being incorporated. The issue of how to handle active tanks is currently being reviewed. DOE's position is that tanks located outside buildings are still active and should not be included in this field sampling TM. The tanks that fall under this category should be investigated when they are taken out of service. Tanks already identified as inactive are being rechecked to determine if they are still inactive and can be investigated.

A Process Improvement Team (PIT) was established to develop a strategy to disposition all tanks at the RFP. A branch on the flow diagram deals with tanks included in OU 9. The meeting held on November 15, 1993, discussed refinements to the flow diagrams and identification of specific issues that need to be addressed in the team's final report. On November 19, 1993, a working meeting was held to comment on the flow diagrams, correct logic discrepancies and make the diagrams more understandable for operations personnel.

### **Technical Memoranda**

# **Project**

TM #1
TM Title
TM Status

# **OU 9-Original Process Waste Lines**

Field Sampling Plan - OPWL - Volume I - Tanks When preparation is concluded or is estimated to be concluded: Jan 94

Projected date of submittal to EPA/CDH: Jan 94

Actual date of submittal: N/A

Date when EPA/CDH comments received: N/A

Planned Work for December • Complete Final OU 9 TM #1.

**Problems** 

None

of the Community

Open Items

Issue of how to disposition active tanks in OU 9 TM #1.

# 2.10 OU 10 - OTHER OUTSIDE CLOSURES

OU 10 is made up of 15 IHSSs scattered throughout the plant, which consist of various hazardous waste units. Six of the IHSSs are located in the PA, two are located in the buffer zone near the present landfill, and the remaining IHSSs are located near various buildings throughout the plant. The types of wastes identified at these sites range from pondcrete/saltcrete storage and drum storage to a utilization yard with waste spills. A Final Phase I RFI/RI Work Plan is currently in preparation. The primary components of the RFI/RI Work Plan for OU 10 will be an FSP, Baseline Risk Assessment Plan (BRAP) and an EE Work Plan.

| Scope of Work Changes This Period         | None   |                        |
|---|--|------------------------|
| Technical Approach<br>Changes This Period | None   |                        |
| IAG Milestone<br>Accomplishments          | Submit Draft Phase I RFI/RI Work Plan<br>Submit Final Phase I RFI/RI Work Plan | 27 Nov 91<br>01 May 92 |

# Future IAG Milestones Through FY95

| Milestone Name                          | IAG Date<br>Scheduled | Extension<br>Status | <u>Planned</u><br><u>Accomplishment</u><br><u>Date</u> |
|---|-----------------------|---------------------|--|
| Submit Draft Phase I RFI/RI Report      | 25 Aug 94             |                     | 02 Nov 15  |
| Submit Final Phase I RFI/RI Report      | 30 Jan 95             |                     | 19 Jul 16  |
| Submit Draft Phase I Proposed IM/IRA DD | 26 May 95             |                     | 26 Feb 18  |
| Submit Draft Phase II RFI/RI Work Plan  | 27 Jun 95             |                     | 25 May 17  |

# November Work Activity Status

All field work for OU 10 was suspended until comments on the IA HSP are resolved. It is anticipated that the date for initiating field work will be December 8, 1993.

The high purity germanium detector (HPGe) gamma survey in IHSS 176, inside the Protected Area (PA), was completed. Initial evaluation of the spectral data indicates the presence of extremely low levels of activity for uranium and americium. Additional data points are being collected in the PA for other IA OUs.

IHSS 170/174 and 176 Waste Remove Update - A resolution of responsibility for the removal of materials from the IHSSs continues to be discussed. To date, a decision has not been made regarding this issue. Until this issue is resolved, no efforts will be made to begin work on removing all materials found in or around IHSSs 170/174 and 176. However, work will proceed in areas

where material storage will not adversely affect data collection activities.

### **Technical Memoranda**

No TMs have been developed for OU 10. The first TM for OU 10 will be for the nonintrusive field work, tentatively scheduled to be completed in March 1994.

# Planned Work for December

- Complete surficial soil sampling in OU 10, IHSS 170/174.
- Begin surficial soil sampling in IHSSs: 175, 176 and 210.

# **Problems**

Characterization and assessment of IHSSs in OUs 9, 10, and 15 represent significant problems until materials stored in the IHSSs are removed so the IHSSs can be assessed.

Efforts are still unresolved to either transfer IHSSs 213 (904 storage pad) and 214 (750 storage pad) to OU 4 or the RFP Permit modification.

# **Open Items**

None

08 Jun 901

02 Jan 92

# 2.11 OU 11 - WEST SPRAY FIELD

The West Spray Field is located within the Rocky Flats Plant buffer zone immediately west of the plant security area. The West Spray Field was in operation from April 1982 to October 1985. During operation, excess liquids from solar evaporation ponds 207-B North and Center (contaminated ground water in the vicinity of the ponds and treated sanitary sewage effluent) were pumped periodically to the West Spray Field for spray application. The spray field boundary covers an area of approximately 105.1 acres, 38.3 of which received direct application of hazardous waste. The RFI/RI process will entail field studies to investigate the presence or absence of hazardous constituents in soil and ground water.

Scope of Work Changes This Period

None

Technical Approach Changes This Period

None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work plan Submit Final Phase I RFI/RI Work plan

# Future IAG Milestones Through FY95

| Milestone Name                         | IAG Date<br>Scheduled | Extension<br>Status | <u>Planned</u><br><u>Accomplishment</u><br><u>Date</u> |
|--|-----------------------|---------------------|--|
| Submit Draft Phase I RFI/RI Report     | 20 Sep 94             |                     | 18 Apr 95  |
| Submit Final Phase I RFI/RI Report     | 22 Feb 95             |                     | 03 Jan 96  |
| Submit Draft Phase II RFI/RI Work Plan | 21 Aug 95             |                     | 25 Nov 96  |

November Work Activity Status

Work on the ecological Risk Assessment EE is ongoing.

Bids are being prepared for a subcontract to perform the combined Phases RFI/RI field work and report writing.

DOE is reviewing preliminary comment responses to the revised FSP.

### **Technical Memoranda**

**Project** 

**OU 11 - West Spray Field** 

TM #1 TM Title

Revised Field Sampling Plan and Data Quality

Objectives.

**TM Status** 

Under development

HHRA Technical Memoranda is scheduled to begin in

**FY94** 

Planned Work for December

**Problems** 

- Deliver TM #1, Revised FSP and Data Quality Objectives (DQO), to the regulatory agencies.
- A concern exists that the TM #1, Revised FSP and DQO, will not receive regulatory agencies' approval in time to meet the February 15, 1994, scheduled start of field work.

**Open Items** 

None

# 2.12 OU 12 - 400/800 AREA

The 400/800 Area involves assessment and remediation of the 10 IHSSs at the 400/800 Area: Multiple Solvent Spills at the West and South Loading Dock Areas (IHSSs 116.1 and 116.2); Fiberglassing Areas North and West of Building 664 (IHSSs 120.1 and 120.2); Cooling Tower Ponds - north, east, south, and west of Building 460 (IHSSs 136.1, and 136.2); Building 881 - Conversion Site(147.2); Radioactive Site - South Area (IHSS 157.2); Acid Leaks (2) (IHSS 187); and Multiple Acid Spills (IHSS 189).

Assessment will consist of preparing a Phase I RFI/RI Work Plan, which will include both an EE and a HHRA. After implementation of this Work Plan, field work and sample analysis will be conducted, data will be analyzed, and the Phase I RI Report will be prepared. A Phase II Investigation may be performed as necessary. An FS to determine the best methods to remediate the area will be conducted as part of the assessment.

Remediation will consist of development and execution of a Remedial Action Plan based on results obtained during the assessment phase of the project. This process includes review and approval by the regulatory agencies, followed by a Record of Decision (ROD), release to the public, and implementation of the plan.

| Scope   | of Work | Changes |
|---------|---------|---------|
| This Po |         | •       |

None

Technical Approach Changes This Period None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work plan Submit Final Phase I RFI/RI Work plan

08 May 92 05 Oct 92

# Future IAG Milestones Through FY95

| Milestone Name                     | iAG Date<br>Scheduled | Extension<br>Status | <u>Planned</u><br><u>Accomplishment</u><br><u>Date</u> |
|------------------------------------|-----------------------|---------------------|--|
| Submit Draft Phase I RFI/RI Report | 20 Apr 94             | ·                   | 11 Mar 99  |
| Submit Final Phase I RFI/RI Report | 15 Sep 94             |                     | 17 Nov 99  |

# November Work Activity Status

According to the integrated approach to field work among the IA OUs, OU 12 soil gas surveys are planned to begin after OU 10 is completed; surficial soil sampling is scheduled to be conducted in the same manner. The Readiness Review is scheduled for December 5, 1993, with field work anticipated to begin on December 8, 1993. Therefore, field work for OU 12 will not begin until after December 8, 1993.

# **Technical Memoranda**

The first TM scheduled for OU 12 is the nonintrusive TM, due in April 1993.

Planned Work for December

• Begin staking locations for surficial soil sampling.

**Problems** 

• Evaluate additional HPGe Spectral data.

 Similar to other IA OUs, waste storage will affect certain field activities in OU 12.

Open Items

None

# 2.13 OU 13 - 100 AREA

Cleanup of the 100 Area involves the assessment and remediation of 14 IHSS: Chemical Storage - North, Middle, and South Sites (IHSSs 117.1, 117.2 and 117.3); Oil Burn Pit #1 (IHSS 128); Lithium Metal Destruction Site (IHSS 134); Waste Spills (IHSS 148); Fuel Oil Tank (IHSS 152); Radioactive Site - North Area (IHSS 157.1); Radioactive Site - Building 551 (IHSS 158); Waste Peroxide Drum Burial (IHSS 169); Solvent Burning Ground (IHSS 171); Valve Vault 12 (IHSS 186); Caustic Leak (IHSS 190); and the Hydrogen Peroxide Spill (IHSS 191), and the Scrap Metal Site (IHSS 197).

Assessment will consist of preparing a Phase I RFI/RI Work plan, which will include both an EE and an HHRA. After implementation of this Work Plan, field work and sample analysis will be conducted, data will be analyzed, and the Phase I RI Report will be prepared. A FS to determine the best methods to remediate the area will be conducted as part of the assessment.

Remediation will consist of development and execution of a Remedial Action Plan based on results obtained during the assessment phase of the project. This process includes review and approval by the regulatory agencies, followed by a ROD, release to the public, and implementation of the plan.

| Scope  | of Wo | rk Chang | ges |
|--------|-------|----------|-----|
| This P | eriod |          |     |

None

# Technical Approach Changes This Period

None

IAG Milestone Accomplishments Submit Draft Phase I RFI/RI Work plan Submit Final Phase I RFI/RI Work plan

15 May 92 12 Oct 92

Diannod

Future IAG Milestones Through FY95

| Milestone Name                     | IAG Date<br>Scheduled | Extension<br>Status | Accomplish Date |
|------------------------------------|-----------------------|---------------------|-----------------|
| Submit Draft Phase I RFI/RI Report | 8 Aug 94              |                     | 24 Mar 99       |
| Submit Final Phase I RFI/RI Report | 11 Jan 95             |                     | 02 Dec 99       |

# November Work Activity Status

A draft letter report/sampling plan for CDH and EPA approval was drafted.

Final Draft of the Compendium of in situ radiological methods and applications was concurrently reviewed by DOE and RFP. DOE commented on this report and these comments were incorporated into the final document.

### **Technical Memoranda**

The current FYP indicates TM #1, Human Health Risk Assessment-Exposure Assessment, and TM #2, Human Health Risk Assessment-Modeling, are scheduled for completion in 1994. These tasks will require rescheduling due to the integration of OUs 8, 9, 10, 12, 13, and 14. Currently, only nonintrusive RI field work is scheduled for OU 13 in FY94. Preparation of the TMs will not begin until FY95.

A nonintrusive TM will be prepared in FY94 summarizing the nonintrusive field work and recommending Stage II activities for the remedial investigation intrusive field work.

### Planned Work for December

- Continue work on the integrated field sampling plan.
- Begin integrated field sampling, surficial soils.

### **Problems**

Open Items

### None

SOPs need to be issued as controlled documents

# 2.14 OU 14 - RADIOACTIVE SITES

Work at the "Radioactive Sites" involves the assessment and remediation of eight IHSSs: Radioactive Site - 700 Area Site #1 and Site #2 (IHSS 131); Radioactive Soil Burial - Building 334 Parking Lot and Soil Dump Area (IHSSs 156.1); Building 444 Parking Lot (IHSS 160) and Building 664 (IHSS 161); and Radioactive Site - 700 Area Site #2 (IHSS 162); and Radioactive Sites - 800 Area which includes the Concrete Slab, Building 886 Spills, and the Building 889 Storage Pad (IHSSs 164.1, 164.2, and 164.3). In 1991, one of two Soil Dump Area IHSSs (156.2) was deleted from OU 14 and added to OU 6.

Assessment will consist of preparing a Phase I RFI/RI Work Plan, which will include both an EE and an HHRA. After implementation of this work plan, field work and sample analysis will be conducted, data will be analyzed, and the Phase I RI Report will be prepared. An FS to determine the best methods to remediate the area will be conducted as a subsequent phase to the assessment phase.

Remediation will consist of development and execution of a Remedial Action Plan based on results obtained during the assessment phase and feasibility study of the project. This process includes review and approval by EPA and CDH, followed by a ROD, release to the public, and implementation of the plan.

| Scope  | of Work | Changes |
|--------|---------|---------|
| This P | eriod   | •       |

None

# Technical Approach Changes This Period

None

IAG Milestone Accomplishments

Submit Draft Phase I RFI/RI Work Plan 26 Jun 92 Submit Final Phase I RFI/RI Work Plan 19 Oct 92

Future IAG Milestones Through FY95 None

November Work Activity Status

Work continues on OU 14 background issues. RFP personnel are meeting with RCRA personnel to get maps and other information about the RCRA materials permitted for storage in OU 14 IHSSs.

**Technical Memoranda** 

Current plans indicate TM #1, Human Health Risk Assessment-Exposure Assessment, and TM #2, Human Health Risk Assessment-Modeling, are scheduled for completion in March 1994. These tasks will require rescheduling due to the integration of OUs 8, 9, 10, 12, 13, and 14. Currently, only nonintrusive

RI field work is scheduled for OU 14 in FY94. Preparation of the TMs will not begin until FY95.

A nonintrusive TM will be prepared in FY94 summarizing the nonintrusive field work and recommending Stage II activities for the remedial investigation intrusive field work.

# Planned Work for December

- Continue to work on the integrated field sampling plan.
- Conduct ORR for the integrated OUs.

# **Problems**

**Open Items** 

None

None

# 2.15 OU 15 - INSIDE BUILDING CLOSURES

OU 15 is composed of seven IHSSs: IHSS 178, Building 881 - Drum Storage Area; IHSS 179, Building 865 - Drum Storage Area; IHSS 180, Building 883 - Drum Storage Area; IHSS 204, RCRA Unit 45 - Original Uranium Chip Roaster; IHSS 211, RCRA Unit 26, Building 881 - Drum Storage Area; IHSS 212, RCRA Unit 63, Building 374 Drum Storage Area; and IHSS 217, RCRA Unit 32, Building 881 - Cyanide Bench Scale Treatment. The seven IHSSs currently have interim status under RCRA.

Closure Plans for the IHSSs were submitted to CDH during 1988 and 1989. The IHSSs were also included within the IAG to undergo a RCRA Facility Investigation/Remedial Investigation (RFI/RI). During scoping meetings for preparation of the Phase I RFI/RI Work Plan for Operable Unit 15 conducted between EPA, CDH and DOE during April 1992, the Closure Plan and RFI/RI Processes were combined. In affect, Clean Closure Performance Standard (6 CCR 1007-3, Part 265.111) will serve as the Applicable or Relevant and Appropriate Requirements for the OU 15 RFI/RI inside buildings and Closure Plans will no longer be prepared. The public comment period required for the Closure Plan process will be fulfilled through the IM/IRA process of the IAG.

Drums containing solids and liquids were stored at the OU 15 IHSSs. Types of waste stored in drums included oils, coolants and solvents containing chlorinated hydrocarbons (RCRA F001 and F002 wastes) and waste paints and waste metals contaminated with solvents. Hazardous constituents include chlorinated solvents, beryllium, and uranium. Since only one release has been documented in an OU 15 IHSS, the effort is to determine if contamination is present. The major activity proposed is characterization of contamination associated with the OU 15 IHSSs both inside and outside buildings and, if applicable, decontamination of the concrete floors at the indoor facilities and remediation of contamination outside buildings.

During April 1992, IHSS 215, Unit 55.13-Tank T-40, was deleted from OU 15 and added to OU 9 as part of a IHSS realignment pursuant to Part 32, Paragraph 191 (Additional Work or Modification to Work) of the IAG. This change was recommended by DOE in the OU 9 Phase I RFI/RI Work Plan approved by CDH and EPA in April 1992. Similarly, IHSS 212, RCRA Unit 63 was removed from the OU 15 RFI/RI process since it is currently active as a Drum Storage Area and has been included in the Rocky Flats Plant RCRA Part B TRU Mixed Waste permit application.

**Scope of Work Changes This Period** 

None

Technical Approach Changes This Period

None

IAG Milestone Accomplishment Submit Draft Phase I RFI/RI Work Plan Submit Final Phase I RFI/RI Work Plan 01 Jun 92 26 Oct 92

# Future IAG Milestones Through FY95

| Milestone Name                     | IAG Date<br>Scheduled | Extension<br>Status | Planned<br>Accomplishment<br>Date |  |
|------------------------------------|-----------------------|---------------------|-----------------------------------|--|
| Submit Draft Phase I RFI/RI Report | 1 Aug 94              | •                   | 1 Aug 94                          |  |
| Submit Final Phase I RFI/RI Report | 04 Jan 95             |                     | 04 Jan 95                         |  |

# November Work Activity Status

Completion of Stage I and II field work inside Building 447, IHSS 204 was delayed because of an equipment failure that occurred on November 4, 1993. However, OU 15 field work was completed on November 9, 1993. Chemical analysis will be completed during December 1993 and should be available by December 23, 1993, for evaluation. DOE will receive a chemical analysis status Report by December 21, 1993.

Negotiations regarding the subcontract modification for delays to OU 15 field work inside buildings were conducted on November 18, 1993, and subcontract modifications were completed as a result of those negotiations.

Preparation of the Phase I RFI/RI Work Plan for TM #1, FSP, continues. Available chemical analysis data (not validated) is being obtained and evaluated.

### **Technical Memoranda**

| <u>Project</u> | OU 15 - Inside Building Closure |
|----------------|---------------------------------|
|                |                                 |

TM #1
TM Title
TM Status

Field Sampling Plan (FSP)

When preparation is concluded or is estimated to be

concluded:

Projected date of submittal to EPA/CDH: 22 Feb 93

Actual date of submittal:

Date when comments were received:

TM #2 TM Title TM Status

Human Health and Risk Assessment (HHRA)

When preparation is concluded or is estimated to be

concluded:

Projected date of submittal to EPA/CDH:

Actual date of submittal:

Date when comments were received:

**Planned Work for December** 

| AN | of | 77 |
|----|----|----|
|    |    |    |

- Complete the annotated outline of TM #1, FSP, for review, discussion and concurrence by the regulatory agencies.
- Sections one and two of TM #1, *FSP*, are scheduled for completion by December 22, 1993.

**Problems** 

None

**Open Items** 

None



# 2.16 OU 16 - LOW PRIORITY SITES

This assessment activity consists of preparing a No Further Action Justification Document (NFAJD) for seven IHSSs: Solvent Spill, Antifreeze Discharge, Steam Condensate Leaks (400 and 700 Areas), Nickel Carbonyl Disposal, Water Treatment Plant Backwash Pond, and Scrap Metal Sites. The NFAJD was approved by the regulatory agencies.

Scope of Work Changes This Period

None

Technical Approach Changes This Period None

IAG Milestone Accomplishments Submit Draft No Further Action
Justification Document

04 Mar 92

Submit Final No Further Action

30 July 92

Justification Document
Submit Revised Final NFAJ Document

16 Oct 92

Future IAG Milestones Through FY95

None

November Work Activity Status

A preferred alternative was announced to address OU 16. The preferred remedy for the soils is the "No Action" alternative for IHSSs 185, 192, 193, 194, 195 within OU 16. These hazardous sites currently present no risk to human health and the environment. Past cleanup actions or natural processes have eliminated the hazardous substances. However, previous cleanup actions and natural processes may not have eliminated the hazardous substances for IHSSs 196 and 197 within OU 16. Therefore, IHSSs 196 and 197 will be transferred for further investigation into OU 5 and OU 13, respectively.

A Public Comment period for the Proposed Plan/Draft Modification of Colorado Hazardous Waste Permit for RFP OU 16: Low Priority Sites started November 8, 1993, and will end January 7, 1994. A "dry run" of the OU 16 Public Hearing was held on November 19, 1993, and was attended by the regulatory agencies, DOE and RFP Personnel. A Public Hearing will be held at the Denver West Marriott from 9:00 p.m. on December 8, 1993.

# Technical Memoranda None Planned Work for December Problems None None None None None None

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7005.

# 2.17 SITEWIDE ACTIVITIES

Sitewide activities include several tasks that encompass a wide variety of plans, procedures, reports, studies, and other activities required by the IAG and that apply to RFP environmental restoration activities in general. The activities include, but are not limited to, the HSP, a Sampling and Analysis Plan, a Plan for Prevention of Contaminant Dispersion, the Community Relations Plan, the Discharge Limits for Radionuclides Work Plan, Treatability Study deliverables, the Background Study Plan, Administrative Record, State Response (support for CDH oversight), Historical Release Report, Operations Management, Decontamination Facilities, Contractor yard support, ER Waste handling facilities, geologic characterization, hydrogeologic characterization, and ground water monitoring.

| Scope of Work Changes<br>This Period   | None   |   |
|--|--|---|
| Technical Approach Changes This Period | None   | •   |
| IAG Milestone<br>Accomplishments       | Submit Draft Background Study Report (Water) Submit Draft Background Study Report (Soils) Submit Draft Community Survey Plan Submit Final Community Survey Plan Submit Draft Health and Safety Plan Submit Draft Quality Assurance Project | 15 Dec 89<br>15 Dec 89<br>23 Jan 90<br>22 Mar 90<br>15 Aug 90 |
|  | Plan Submit Draft Standard Operating Procedures Submit Draft Plan for Prevention of Contaminant Dispersion Submit Draft Treatability Study Plan Submit Draft Community Relations Plan  | 29 Aug 90<br>29 Aug 90<br>19 Sep 90<br>21 Sep 90<br>01 Nov 90 |
|  | Submit Final Health and Safety Plan Submit Revised Background Study Report Submit Final Community Relations Plan Submit Final Quality Assurance Project Plan Submit Final Standard Operating   | 12 Nov 90<br>21 Dec 90<br>22 Jan 91<br>01 Mar 91              |
|  | Procedures Submit Draft Radionuclides Discharge Limits Plan Submit Community Relations Plan Responsiveness Summary Submit Final Treatability Study Plan Submit Final Plan for Prevention of Contaminant Dispersion                         | 01 Mar 91<br>05 Apr 91<br>21 Jun 91<br>03 Jun 91<br>22 Jul 91 |
|  | Contaminant Dispersion   | 22 Jul 91   |

| Submit Final Plan Discharge Limits Radionuclides | 16 Sep 91 |
|--|-----------|
| Submit Final PPCD and Responsiveness Summary     | 25 Nov 91 |
|  |           |
| Submit Draft Historical Release Report           | 08 Jan 92 |
| Submit Responsiveness Summary for                |           |
| DLRP   | 31 Jan 92 |
| Submit Final Historical Release Report           | 03 Jun 92 |
| Submit Annual Treatability Study Report          | 08 Mar 93 |

# Future IAG Milestones Through FY95

None

# November Work Activity Status

### **Sitewide Activities**

# Sitewide Treatability Studies EPA SITE Demonstration of the Colloid Filter Polishing Method Technology - A poster dealing with the EPA SITE demonstration of the Colloid Filter Polishing Method Technology at RFP was presented at the Fifth

Method Technology at RFP was presented at the Fifth Annual Technical Information Exchange (TIE) Workshop held November 16 and 17, 1993.

**Solar Detoxification** - A meeting was held at the OU 1 site on November 19, 1993, between DOE and RFP to review the site as a possible location for field testing of the solar detoxification equipment. As the result of the valuation, the site appeared to be acceptable for the proposed test work.

**Bioremediation** - Several projects will be tested. These projects include composting of chlorinated solvent contaminated soils and bioadsorption of radionuclides. Environmental Technology is preparing the laboratory space for the bioremediation studies to begin.

A meeting was held on November 5, 1993, among DOE, Los Alamos National Laboratories (LANL), RFP and local universities interested in working on bioremediation at RFP. All of the group's interests and involvement were discussed at the meeting, and some preliminary plans were laid out to fund some bioremediation work through the local universities.

Magnetic Separation - The revised Los Alamos Technical Office (LATO) proposal was received on November 18, 1993, from the subcontract administrator (SA). The proposal was reviewed and approved by the contract technical representative (CTR) on November 19, 1993. DOE will receive the package from RFP Procurement and it should take 2 to 3 weeks to go through the approval process. The contract is scheduled to be awarded in January 1994.

Ion Exchange and Adsorption - Ion Exchange and Adsorption are two of the technologies identified in the Final Sitewide Treatability Plan. The Ion Exchange and Adsorption activity was placed on hold, pending resolution of field sampling issues.

Administrative Record - The Quarterly updates of the Administrative Record (AR) Index was delivered to the four public repositories on November 17, 1993. The microfiche copies of the AR File for all OUs were made on November 24, 1993. The next scheduled update of the public repositories is February 25, 1994.

The four public repositories were sent the updated OU 16 AR File to ensure that these records were available to the public during the public comment period from November 8, 1993 through January 7, 1994.

**Community Relations** - The Community Relations Plan is being updated. The current scheduled date for the draft revised plan is in January 1994.

Work continues on the Technical Review Group (TRG) Meeting scheduled for December 6, 1993. The topic to be discussed is the comment resolution process.

### Other Sitewide Operations

Integrated Operable Units - OUs 8, 9, 10, 12, 13, and 14 - The Readiness Review (RR) activity descriptions were completed and delivered to RFP Environmental Restoration Management (ERM). RFP ERM requested that the RR checklists and the RR meeting be held on December 3, 1993. If the December 3, 1993, date is met, the subcontractor will begin field sampling on December 8, 1993.

Industrial Area (IA) Interim Measures/Interim
Remedial Action Plan (IM/IRAP) - A meeting was held to
resolve ground water modeling, risk assessment, project
status update, and changes in scope brought about by the
further refinement of the project objectives. A contract
modification will be initiated to allow additional D&D

monitoring issues to be addressed, and to allow the project to include an overview of spill response capabilities for the IA.

Work is continuing on development of generic IM/IRA language to facilitate implementation of the Strategic Plan. Weekly meetings are under way and an activity scoping document is being produced.

**Decontamination & Decommissioning (D&D)** - Phase I of the development of the D&D Program Guidance Document is complete. RFP Transition Management is preparing a schedule and cost to perform pre-task planning for the D&D of Building 788.

Planned Work for December • Continue updates on AR.

**Problems** 

Continue Community Relations activities.

• •

None

**Open Items** 

None

# SECTION 3. ROUTINE ENVIRONMENTAL MONITORING

The following generalized sampling schedule for Routine Environmental Monitoring is provided as requested in Section 210 of the IAG. Detailed quarterly monitoring schedules are prepared in advance and are available to EPA and CDH upon request from the Environmental Management Department and EG&G Rocky Flats, Inc. The schedules are lengthy; therefore, they are not reproduced here. An EPA- or State-authorized representative may make arrangements to observe fieldwork and to obtain split or duplicate samples.

# 3.1 SURFACE WATER AND SEDIMENTS

- Each of the Surface Water Stations (approximately 20 stations) are sampled quarterly.
- Each of the Sediment Stations (approximately 10 stations) are sampled quarterly. .
- Each surface water and sediment sample is analyzed for the following parameters:

CLP TCL VOA

Metals CLP TAL & Non-TAL
Field Parameters
Specific Conductivity
Dissolved Oxygen (DO)

Major Anions

Radionuclides
Temperature
TDS/TSS
pH
Nutrients

 Additionally, sediment samples are analyzed for: CLP-Semi VOAs, CLP-Pesticides/PCBs Herbicides-619

# 3.2 SOILS

- Each of the Soil Stations (located at 1- and 2-mile radii from the plant center) are sampled annually.
- Each soil sample is analyzed for plutonium and americium.

# 3.3 GROUND WATER

A total of 410 Ground water Stations are sampled quarterly; this includes alluvial wells and bedrock wells. Approximately one third of the wells are monitored monthly for water levels. Each ground water sample is analyzed for the following parameters:

| Radiochemical Parameters | Inorganic Parameters          | Field Parameters     |
|--------------------------|-------------------------------|----------------------|
| Gross Alpha              | Nitrate/Nitrite               | Specific Conductance |
| Gross Beta               | Total Phosphorous             | Temperature .        |
| Plutonium                | Ortho-Phosphate               | Turbidity            |
| Americium                | Ammonia                       | pН                   |
| Strontium                | TDS                           |                      |
| Tritium                  | Chlorine                      | • .                  |
| Uranium                  | Fluorine                      |                      |
| Cesium                   | Sulfate                       |                      |
| . •                      | Carbonate                     |                      |
|                          | Bicarbonate                   | -                    |
|                          | TSS                           |                      |
| •                        | Dissolved CLP & additional m  | etals                |
|                          | Cyanide                       |                      |
|                          | CLP Volatile Organic Constitu | ents                 |

# SECTION 4. CONTRACTOR/SUBCONTRACTOR IDENTIFICATION

Contractors and subcontractors being used on the RFP ER Program and the work they are performing are identified on the following list as required by paragraph 13 of the IAG.

| Start Date   |
|--|
| Jan 92   |
| ation Apr 93   |
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| Project     | Subcontractor .   | Subcontractor  | WOR Description  | Siail Dale   |
| Assessment  | S.M. Stoller  |  | Implementation of EE section of OU 5 Work Plan   | Sep 92   |
| Assessment  | Woodward-Clyde  | Lane, Ogden, Geo<br>Environmental  | OU 6 RFI/RI Work Plan and Quality<br>Assurance Addendum  | Aug 92   |
| Assessment  | S.M. Stoller  |  | Implementation of EE section of OU 6 Work Plan   | Sep 92   |
| Assessment  | S.M. Stoller  | Walsh & Assoc.   | OU 7 RFI/RI Work Plan Implementation including EE Plan and QA Addendum   |  |
| Assessment  | Jacobs Eng.   | Walsh & Assoc.   | (No Sub tier subcontract) implement<br>the Phase I RFI/RI Work Plan for non-<br>intrusive field work for the IA OUs.   | Aug 93   |
| Assessment  | Jacobs Eng.   | Walsh & Assoc.   | (No Sub tier subcontract) implement<br>the Phase I RFI/RI Work Plan for non-<br>intrusive field work for the IA OUs.   | Aug 93   |
| Assessment  | Jacobs Eng.   | Walsh & Assoc.   | (No Sub tier subcontract) implement<br>the Phase I RFI/RI Work Plan for non-<br>intrusive field work for the IA OUs.   | Aug 93   |
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| Assessment  | Jacobs Eng.   | Walsh & Assoc.   | (No Sub tier subcontract) implement<br>the Phase I RFI/RI Work Plan for non-<br>intrusive field work for the IA OUs.   | Aug 93   |
| Assessment  | Jacobs Eng.   | -1   | (No Sub tier subcontract) implement<br>the Phase I RFI/RI Work Plan for non-<br>intrusive field work for the IA OUs.   | Aug 93   |
| Assessment  | ERM-Rocky Mtn.  | G.S. Miller, Inc.  | Implementation of the RFI/RI Work Pla  | an Mar 93  |
| HRR         | IT Corporation  | Doty & Assoc.  | Prepare HRR  | Feb 91   |
| Adm. Record | QuantaLex   |  | Maintain IAG Administrative Record   | Oct 90   |
| Geo. Char.  | Jacobs Eng.   |  | Well Abandonment and Replacement   | Mar 93   |
| Geo. Char.  | Colorado State<br>University  |  | Support M.S. thesis of Structural<br>Geology, of Front Range Area<br>Near RFP  | Nov 91   |
| Geo. Char.  | S.M. Stoller  | · · ·  | Prepare 1992 Annual RCRA Report and Addendum   | Jan 93   |
| Geo. Char.  | Colorado<br>School of Mines   |  | Masters level training program in ES and Engineering   | Aug 92   |
| Geo. Char.  | Woodward-Clyde  | 14 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)   | Support for the SSWMS  | Feb 93   |
|             | Assessment Assessment Assessment Assessment Assessment Assessment Assessment Assessment Assessment Geo. Char. Geo. Char. Geo. Char. | Assessment Woodward-Clyde  Assessment S.M. Stoller  Assessment S.M. Stoller  Assessment Jacobs Eng.  Geo. Char. GuantaLex  Geo. Char. GuantaLex  Geo. Char. Colorado State University  Geo. Char. Colorado School of Mines  Geo. Char. Colorado School of Mines  Geo. Char. Woodward-Clyde | Project Subcontractor Assessment S.M. Stoller  Assessment Woodward-Clyde Lane, Ogden, Geo Environmental  Assessment S.M. Stoller Walsh & Assoc.  Assessment Jacobs Eng. G.S. Miller, Inc.  HRR IT Corporation Doty & Assoc.  Adm. Record QuantaLex  Geo. Char. Jacobs Eng.  Geo. Char. Colorado State University  Geo. Char. S.M. Stoller  Geo. Char. Woodward-Clyde | Project Subcontractor Subcontractor Work Description  Assessment S.M. Stoller Implementation of EE section of OU 5 Work Plan  Assessment Woodward-Clyde Lane, Ogden, Geo Environmental  Assessment S.M. Stoller Implementation of EE section of OU 6 RFI/RI Work Plan and Quality Assurance Addendum  Assessment S.M. Stoller Walsh & Assoc. OU 7 RFI/RI Work Plan Implementation of Unit of Work Plan  Assessment Jacobs Eng. Walsh & Assoc. (No Sub tier subcontract) implement the Phase I RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. Walsh & Assoc. (No Sub tier subcontract) implement the Phase I RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. Walsh & Assoc. (No Sub tier subcontract) implement the Phase I RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. Walsh & Assoc. (No Sub tier subcontract) implement the Phase IRFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. Walsh & Assoc. (No Sub tier subcontract) implement he Phase IRFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. (No Sub tier subcontract) implement the Phase IRFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment Jacobs Eng. (No Sub tier subcontract) implement the Phase IRFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment ERM-Rocky Mtn. G.S. Miller, Inc. Implementation of the RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment ERM-Rocky Mtn. G.S. Miller, Inc. Implementation of the RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment ERM-Rocky Mtn. G.S. Miller, Inc. Implementation of the RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment ERM-Rocky Mtn. G.S. Miller, Inc. Implementation of the RFI/RI Work Plan for non-intrusive field work for the IA OUs.  Assessment ERM-Rocky Mtn. G.S. Miller, Inc. Implementation of the RFI/RI Work Plan for non-intrusive field work for the IA OUs.  A |

# Contractor/Subcontractor Identification

| <u>ou</u> | <u>Project</u> | Subcontractor                | Sub-<br>Subcontractor | Work Description  | Start Date |
|-----------|----------------|------------------------------|-----------------------|---|------------|
| SW        | Geo. Char.     | Colorado State<br>University |                       | Sequential Extraction   | April 92   |
| sw        | Geo. Char.     | University of Colorado       |                       | Soil Monitoring Vadose Zone                                       | Jun 92     |
| SW        | Geo. Char.     | S.M. Stoller                 |                       | Spatial Analysis/Computer Support                                 | Mar 93     |
| SW        | Geo. Char.     | Woodward Clyde               | SAIC/Wright Water     |   | Jan 93     |
| SW        | Monitoring     | IT Corporation               |                       | Analytical Services for ground water, surface water, and sediment | Jul 90     |
| SW        | QA             | SAIC                         |                       | Develop and implement QA program and field operations oversight   | Dec 90     |
| PM        | Support        | S.M. Stoller                 |                       | Program Management Support  | Oct 92     |
| PM        | QA Support     | SAIC                         |                       | Provide QA/QC support to ER Progra                                | m Nov 92   |

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| DOE, Rocky Flats Plant |   |   |   |   |     |   |
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# Acronyms

ADS Activity Data Sheet
AIP Agreement in Principle

ALARA As Low As Reasonably Attainable

AOC Area of Concern

ARAR Applicable or Relevant and Appropriate

Requirements

ASRP Accelerated Sludge Removal Project

BAT Best Available Technology
BCP Baseline Change Proposal
BOA Basic Ordering Agreement
BRAP Baseline Risk Assessment Plan

CERCLA Comprehensive Environmental Response,

Compensation, and Liability Act

CHWA Colorado Hazardous Waste Act
CMS Corrective Measures Study
COC Contaminant Of Concern
CPT Cone Penetrometer Testing
CRP Community Relations Plan
CSU Colorado State University
DAC Derived Air Concentration

DD Decision Document

D&D Decontamination & Decommissioning

DCN Document Change Notice

DLRP Discharge Limits Radionuclides Plan

DOE Department of Energy
DQO Data Quality Objectives
DVP Data Validation Plan

E&WM Environmental and Waste Management

**Environmental Assessment** EA **Environmental Evaluation** EE **Environmental Management** EM **END Environmental NEPA Division Environmental Protection Agency EPA EQS Environmental Quality Support Environmental Restoration** ER **ERA Ecological Risk Assessment** 

ESE Environmental Science and Engineering
FIDLER Field Instrument for Detection of Low Energy

Radiation

FS Feasibility Study
FSP Field Sampling Plan
FTU Field Treatability Unit

FYP Five-Year Plan

GAC Granular Activated Carbon
GIS Geographic Information System

| GPR H&S HSP HAP HGMS HHRA HPGe HRR IA IAG ICP-MS IDM IHSS IM IRAP ITS IWCP | Ground Penetrating Radar Health and Safety Health and Safety Plan Health Advisory Panel High Gradient Magnetic Separation Human Health Risk Assessment High Purity Germanium Historical Release Report Industrial Area Interagency Agreement Inductively Coupled Plasma Mass Spectrometer Investigative Derived Material Individual Hazardous Substance Site Interim Measure Interim Remedial Action Interim Remedial Action Plan Interceptor Trench System Integrated Work Control Package |
|--|---|
| IX   | Ion Exchange  |
| LANL<br>LATO   | Los Alamos National Laboratory Los Alamos Technology Office   |
| LL<br>LLMW   | Low-level Low-level Mixed Waste   |
| MOU  | Memorandum of Understanding   |
| MTS  | Master Task Subcontract   |
| MSVEU  | Mobile Soil Vapor Extraction Unit   |
| NAPLs  | Non-Aqueous Phase Liquids   |
| NEPA   | National Environmental Policy Act   |
| NFAJ   | No Further Action Justification   |
| NTS  | Nevada Test Site  |
| O&M  | Operations and Management   |
| OPWL   | Original Process Waste Line   |
| ORR  | Operational Readiness Review  |
| OTD  | Office of Technology Development  |
| OU   | Operable Unit   |
| PA   | Protected Area  |
| ppb  | Parts per billion   |
| PCCB   | Plant Change Control Board  |
| PCP  | Process Control Plan  |
| PAC  | Potential Area of Concern   |
| PIT  | Process Improvement Team  |
| PP   | Proposed Plan   |
| PPCD.  | Plan for Prevention of Contaminant Dispersion   |
| PPE<br>PU&D  | Personal Protective Equipment Property Utilization and Disposal   |
| QA   | Quality Assurance   |
| QAPP   | Quality Assurance Project Plan  |
| QP   | Quality Plan  |
| RAGS   | Risk Assessment Guidance for Superfund  |
|  | wassering it adiabation for appointed   |

RCA Radiological Control Area

RCRA Resource Conservation and Recovery Act
RFEDS Rocky Flats Environmental Database System

RFI RCRA Facilities Investigation

RFP Rocky Flats Plant
RI Remedial Investigation
ROD Record of Decision

RPT Radiological Protection Technician

SAR Safety Analysis Report
SID South Interceptor Ditch
SMO Sample Management Office
SOP Standard Operating Procedure

SOW Statement of Work

SPPO Solar Ponds Program Office STP Sewage Treatment Plant

SW Surface Water

TCE Trichloroethene ethylene

TDS Total Dissolved Solids

TIE Technology Information in Exchange

TM Technical Memorandum
TRG Technical Review Group
TSR Treatability Study Report
TSS Total Suspended Solids

UBC Under Building Contaminations

USFWS United States Fish and Wildlife Service

UV Ultraviolet

VOA Volatile Organic Analyte
VOC Volatile Organic Compound
WBS Work Breakdown Structure

WS Waste Solidification